

PART 70 OPERATING PERMIT
OFFICE OF AIR QUALITY
and the
Anderson Office of Air Management

Indiana Municipal Power Agency
Anderson Gas Turbine Generating Facility
6035 Park Road
Anderson, Indiana 46011

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T095-12389-00051	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: Expiration Date:

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SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) and the Anderson Office of Air Management (AOAM). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a gas turbine electric generating plant.

Responsible Official:	Ms. Gayle Mayo, Vice President Planning and Eng.
Source Address:	6035 Park Road, Anderson, Indiana 46011
Mailing Address:	11610 North College Avenue, Carmel, Indiana 46032
Contact Person:	Mr. Jack Alvey
Phone Number:	(317) 575-9955
SIC Code:	4911
County Location:	Madison
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program pursuant to the Acid Rain Program Minor Source under PSD Rules Minor Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

- (a) Two (2) 38.7 megawatt (net) simple cycle gas turbines using natural gas as the primary fuel with No. 2 fuel oil used as a backup identified as T1 and T2, and using a water injection system as control, with each turbine exhausting to stacks, identified as S/V 3 and S/V 4, respectively.
- (b) Two (2) 630 horsepower diesel engines used for turbine start-up, identified as D7 and D8, each exhausting at stacks, identified as S/V 5 and S/V 6, respectively.
- (c) Two (2) 300,000 gallon No. 2 fuel oil storage tanks, identified as FT10 and FT11.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source does not currently have any insignificant activities, as defined in 326 IAC 2-7-1 (21) that have applicable requirements.

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A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22); however, the source has requested to maintain a PSD Minor Source;
- (b) It is an affected source under Title IV (Acid Deposition Control) of the Clean Air Act, as defined in 326 IAC 2-7-1(3), which has required this source to obtain a Part 70 permit;
- (c) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B

GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

B.2 Permit Term [326 IAC 2-7-5(2)]

This permit is issued for a fixed term of five (5) years from the original date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

B.3 Enforceability [326 IAC 2-7-7]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the AOAM, and the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.4 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.5 Severability [326 IAC 2-7-5(5)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

B.7 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)] [326 IAC 2-7-6(6)]

- (a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Anderson Office of Air Management
P.O. Box 2100

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120 East 8th Street
Anderson, Indiana 46011

The submittal by the Permittee does require the certification by the Aresponsible official® as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall furnish to IDEM, OAQ, and the AOAM, within a reasonable time, any information that IDEM, OAQ, and the AOAM, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the Aresponsible official® as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ, and the AOAM copies of records required to be kept by this permit or, for information claimed to be confidential, the Permittee may furnish such records directly to the U. S. EPA along with a claim of confidentiality. [326 IAC 2-7-5(6)(E)]
- (c) The Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for:
 - (1) Enforcement action;
 - (2) Permit termination, revocation and reissuance, or modification; or
 - (3) Denial of a permit renewal application.
- (b) Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act.
- (c) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- (d) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

B.9 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

B.10 Annual Compliance Certification [326 IAC 2-7-6(5)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the sources compliance with the terms and conditions contained in this permit,

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including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of the final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Anderson Office of Air Management
P.O. Box 2100
120 East 8th Street
Anderson, Indiana 46011

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, and the AOAM, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
 - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ, and the AOAM, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the Aresponsible official® as defined by 326 IAC 2-7-1(34).

B.11 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

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- (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
- (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Anderson Office of Air Management
P.O. Box 2100
120 East 8th Street
Anderson, Indiana 46011

The PMP and the PMP extension notification do not require the certification by the ~~A~~responsible official~~@~~ as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, and the AOAM, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ and the AOAM. IDEM, OAQ, and the AOAM, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the ~~A~~responsible official~~@~~ as defined by 326 IAC 2-7-1(34).
- (d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner or the AOAM makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or the AOAM within a reasonable time.

B.12 Emergency Provisions [326 IAC 2-7-16]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-7-16.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

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- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
- (2) The permitted facility was at the time being properly operated;
- (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, and the AOAM, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Indiana Department of Environmental Management, Office of Air Quality
Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967

Anderson Office of Air Management
Telephone Number: 765-648-6158
Fax Number: 765-648-5924

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile, to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Anderson Office of Air Management
P.O. Box 2100
120 East 8th Street
Anderson, Indiana 46011

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the responsible official as defined by 326 IAC 2-7-1(34).

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- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ, and the AOAM, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(10) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ, and the AOAM, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.

Any operation shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.13 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

- (b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. All previously issued operating permits are superceded by this permit, except for permits issued pursuant to Title

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IV of the Clean Air Act (Acid Rain Program) and 326 IAC 21 (Acid Deposition Control).

- (c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAQ, and the AOAM, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
 - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, or the AOAM, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, or the AOAM, has issued the modification. [326 IAC 2-7-12(b)(7)]

B.14 Multiple Exceedances [326 IAC 2-7-5(1)(E)]

Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Anderson Office of Air Management
P.O. Box 2100
120 East 8th Street
Anderson, Indiana 46011

using the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report.

The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:

- (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
- (2) Failure to implement elements of the Preventive Maintenance Plan unless such failure has caused or contributed to a deviation.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

- (c) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination
[326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the responsible official as defined by 326 IAC 2-7-1(34).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, or the AOAM, determines any of the following:
- (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ, or the AOAM, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated

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before notice of such intent is provided to the Permittee by IDEM, OAQ, and the AOAM, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, and the AOAM, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.17 Permit Renewal [326 IAC 2-7-4]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and the AOAM, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the responsible official as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Anderson Office of Air Management
P.O. Box 2100
120 East 8th Street
Anderson, Indiana 46011

(b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]

- (1) A timely renewal application is one that is:

- (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
- (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, and the AOAM, on or before the date it is due.

- (2) If IDEM, OAQ, and the AOAM, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

(c) Right to Operate After Application for Renewal [326 IAC 2-7-3]

If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ, and the AOAM, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, and the AOAM, any additional information identified as being needed to process the application.

(d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]

If IDEM, OAQ, and the AOAM, fails to act in a timely way on a Part 70 permit renewal, the

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U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.18 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12] [40 CFR 72]

- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Pursuant to 326 IAC 2-7-11(b) and 326 IAC 2-7-12(a), administrative Part 70 permit amendments and permit modifications for purposes of the acid rain portion of a Part 70 permit shall be governed by regulations promulgated under Title IV of the Clean Air Act.
- (c) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Anderson Office of Air Management
P.O. Box 2100
120 East 8th Street
Anderson, Indiana 46011

Any such application shall be certified by the Aresponsible official@ as defined by 326 IAC 2-7-1(34).

- (d) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]

- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.20 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:
 - (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
 - (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;

- (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

- (4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Anderson Office of Air Management
P.O. Box 2100
120 East 8th Street
Anderson, Indiana 46011

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, and the AOAM, in the notices specified in 326 IAC 2-7-20(b), (c)(1), and (e)(2).

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require the certification by the Responsible official[®] as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(c)]

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The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).

(d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]

The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, the AOAM, or U.S. EPA is required.

B.21 Source Modification Requirement [326 IAC 2-7-10.5]

A modification, construction, or reconstruction is governed by 326 IAC 2 and 326 IAC 2-7-10.5.

B.22 Inspection and Entry [326 IAC 2-7-6][IC 13-14-2-2]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, the AOAM, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy any records that must be kept under the conditions of this permit;
- (c) Inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Anderson Office of Air Management
P.O. Box 2100
120 East 8th Street
Anderson, Indiana 46011

The application which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, and the AOAM, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ, or the AOAM, the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAQ, Technical Support and Modeling Section), to determine the appropriate permit fee.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-7-5(1)]

C.1 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.
- C.2 Open Burning [326 IAC 4-1] [IC 13-17-9]
The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.
- C.3 Incineration [326 IAC 4-2] [326 IAC 9-1-2]
The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2. 326 IAC 9-1-2 is not federally enforceable.
- C.4 Fugitive Dust Emissions [326 IAC 6-4]
The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.
- C.5 Operation of Equipment [326 IAC 2-7-6(6)]
Except as otherwise provided by statute, rule, or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.
- C.6 Stack Height [326 IAC 1-7]
The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted. The provisions of 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4(d), (e), and (f), and 326 IAC 1-7-5(d) are not federally enforceable.
- C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]
(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
- (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.

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- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Anderson Office of Air Management
P.O. Box 2100
120 East 8th Street
Anderson, Indiana 46011

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Indiana Accredited Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited, pursuant to the provisions of 40 CFR 61, Subpart M, is federally enforceable.

Testing Requirements [326 IAC 2-7-6(1)]

C.8 Performance Testing [326 IAC 3-6]

- (a) All testing performed to determine compliance with applicable emission limitations contained in the permit, or for any other purpose requiring review and approval by IDEM, OAQ, such as an alternate emission factor determination, shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

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Anderson Office of Air Management
P.O. Box 2100
120 East 8th Street
Anderson, Indiana 46011

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ and the AOAM, not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.9 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

C.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
and

Anderson Office of Air Management
P.O. Box 2100
120 East 8th Street
Anderson, Indiana 46011

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the ~~A~~responsible official~~@~~ as defined by 326 IAC 2-7-1(34).

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

C.11 Maintenance of Emission Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]

- (a) In the event that a breakdown of the emission monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less often than once an hour until such time as the continuous monitor is back in operation.
- (b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

C.12 Monitoring Methods [326 IAC 3] [40 CFR 60] [40CFR 63]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.13 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

- (a) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or
- (b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP).

All documents submitted pursuant to this condition shall include the certification by the Responsible official as defined by 326 IAC 2-7-1(34).

C.14 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. The compliance monitoring plan can be either an entirely new document, consist in whole of information contained in other documents, or consist of a combination of new information and information contained in other documents. If the compliance monitoring plan incorporates by reference information contained in other documents, the Permittee shall identify as part of the compliance monitoring plan the documents in which the information is found. The elements of the compliance monitoring plan are:
 - (1) This condition;
 - (2) The Compliance Determination Requirements in Section D of this permit;
 - (3) The Compliance Monitoring Requirements in Section D of this permit;
 - (4) The Record Keeping and Reporting Requirements in Section C (General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
 - (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of

this permit. CRP-s shall be submitted to IDEM, OAQ and the AOAM, upon request and shall be subject to review and approval by IDEM, OAQ and the AOAM. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of:

- (A) Reasonable response steps that may be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and
 - (B) A time schedule for taking reasonable response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to take reasonable response steps may constitute a violation of the permit.
- (c) Upon investigation of a compliance monitoring excursion, the Permittee is excused from taking further response steps for any of the following reasons:
- (1) A false reading occurs due to the malfunction of the monitoring equipment. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied.
 - (3) An automatic measurement was taken when the process was not operating.
 - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (e) All monitoring required in Section D shall be performed at all times the equipment is operating. If monitoring is required by Section D and the equipment is not operating, then the Permittee may record the fact that the equipment is not operating or perform the required monitoring.
- (f) At its discretion, IDEM may excuse the Permittee's failure to perform the monitoring and record keeping as required by Section D, if the Permittee provides adequate justification and documents that such failures do not exceed five percent (5%) of the operating time in any quarter.

Temporary, unscheduled unavailability of qualified staff shall be considered a valid reason for failure to perform the monitoring or record keeping requirements in Section D.

C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]
[326 IAC 2-7-6]

- (a) When the results of a stack test performed in conformance with Section C - Performance

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Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.

- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do not require the certification by the Responsible official as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.16 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

- (a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner or the AOAM makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner and the AOAM within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.17 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

- (a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Anderson Office of Air Management
P.O. Box 2100
120 East 8th Street
Anderson, Indiana 46011

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required

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by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ and the AOAM, on or before the date it is due.

- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The reports do require the certification by the Aresponsible official® as defined by 326 IAC 2-7-1(34).
- (e) All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports. The Emergency/Deviation Occurrence Report does not require the certification by the Aresponsible official® as defined by 326 IAC 2-7-1(34).
- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

Stratospheric Ozone Protection

C.18 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

Two (2) 38.7 megawatt (net) simple cycle gas turbines using natural gas as the primary fuel with No. 2 fuel oil used as a backup identified as T1 and T2, and using a water injection system as control, with each turbine exhausting to stacks, identified as S/V 3 and S/V 4, respectively. When using natural gas, T1 and T2 each have a maximum heat input capacity of 431.3 MMBtu/hr. When using No. 2 fuel oil, T1 and T2 each have a maximum heat input capacity of 424.5 MMBtu/hr.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Fuel Usage Limitations

The total combined fuel use in turbines T1 and T2 shall be limited as follows:

- (a) When natural gas is the only fuel used, the fuel limit is 675.0 million standard cubic feet (MMSCF) per 365 day rolling total.
- (b) When No. 2 fuel oil is the only fuel used, the fuel limit is 3.36 million gallons per 365 day rolling total.
- (c) Fuel limit when both natural gas and No. 2 fuel oil are used during the 365 day period: 675.0 million standard cubic feet (MMCF) natural gas and 3.36 million gallons (MMgal) of No. 2 fuel oil per 365 day rolling total.

These limits restrict the potential to emit of sulfur dioxide (SO₂), particulate matter (PM), particulate matter less than ten (10) microns (PM₁₀), nitrogen oxides (NO_x) and carbon monoxide (CO) to less than 100 tons per year. Thus, 326 IAC 2-2 does not apply.

D.1.2 General Provisions Relating to NSPS [326 IAC 12-1][40 CFR Part 60, Subpart A]

The provisions of 40 CFR 60, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 12-1, apply to the facility described in this section except when otherwise specified in 40 CFR 60, Subpart GG (Standards of Performance for Stationary Gas Turbines).

D.1.3 New Source Performance Standard [326 IAC 12-1][40 CFR 60, Subpart GG]

Pursuant to 40 CFR 60, Subpart GG (Standards of Performance for Stationary Gas Turbines), the Permittee shall comply with the following limits:

- (1) limit nitrogen oxides emissions, as required by 40 CFR 60.332, to:

$$STD = 0.0075 \frac{(14.4)}{Y} + F,$$

where STD = allowable NO_x emissions (percent by volume at 15 percent oxygen on a dry basis).

Y = manufacturers rated heat rate at manufacturers rated load (kilojoules per watt hour) or, actual measured heat rate based on lower heating value of fuel as measured at actual peak load for the facility. The value of Y shall not exceed 14.4 kilojoules per watt hour.

F = NO_x emission allowance for fuel-bound nitrogen as defined in paragraph (a)(3) of 40 CFR 60.332.

- (2) limit sulfur dioxide emissions, as required by 40 CFR 60.333, to 0.015 percent by

volume at 15 percent oxygen on a dry basis, or use natural gas fuel with a sulfur content less than or equal to 0.8 percent by weight.

D.1.4 NOx Emissions Limitations

Pursuant to CP-048-1841, issued on May 11, 1990, the nitrogen oxide (NOX) emissions from the two (2) simple cycle gas turbines (T1 and T2) shall be limited to 42 parts per million dry volume (ppmdv) at 15 percent oxygen when combusting natural gas and 65 parts per million dry volume (ppmdv) at 15 percent oxygen when combusting fuel oil. [These limits are more stringent than the NSPS standards contained in 326 IAC 12 and 40 CFR 60.332 (a) (1) and (b)].

D.1.5 Sulfur Dioxide [326 IAC 2-7-24] [40 CFR 60.333(b)] [326 IAC 7-1.1]

Pursuant to Construction Permit 048-1841, issued on May 11, 1990, the sulfur content of any fuel used in the turbines (natural gas or oil) shall be limited to 0.3% sulfur by weight. Pursuant to 326 IAC 2-7-24, compliance with this limitation shall satisfy the requirements of 40 CFR 60.333(b) and 326 IAC 7-1.1.

D.1.6 Opacity

Pursuant to Construction Permit 048-1841, issued on May 11, 1990, visible emissions from the combustion turbine stacks, S/V3 and S/V4, shall be limited to twenty percent (20%) opacity.

D.1.7 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

Compliance Determination Requirements

D.1.8 NSPS Compliance Provisions [40 CFR 60, Subpart GG]

- (a) Pursuant to 40 CFR 60, Subpart GG and the custom monitoring schedule procedures approved by EPA on April 05, 2001, when combusting natural gas, the turbine shall comply with the sulfur dioxide emissions standard by using pipeline supplied natural gas.
- (b) No alternate fuel burned in the gas turbine shall contain sulfur in excess of 0.8 percent by weight.

D.1.9 Compliance Requirements (Stationary Gas Turbines) [40 CFR 60, Subpart GG]

Pursuant to 40 CFR Part 60, Subpart GG (Stationary Gas Turbines), the Permittee shall monitor and record the fuel consumption and the ratio of water to fuel being fired in the turbine as follows:

- (a) install a continuous monitoring system to monitor the fuel consumption and the ratio of water to fuel being fired in the turbine, as required by 40 CFR 60.334(a).

D.1.10 Sulfur Content and Nitrogen Content [326 IAC 12] [40 CFR 60, Subpart GG]

Compliance shall be determined utilizing the following option when combusting fuel oil: Pursuant to 40 CFR 60.334, Subpart GG, the Permittee shall monitor the nitrogen and sulfur content of the fuel being fired in the turbine. Pursuant to 40 CFR 60.334 (b)(2), the custom monitoring schedule procedures approved by EPA on April 05, 2001 shall be accepted. Monitoring of these values shall be conducted as follows:

- (a) the nitrogen and sulfur content values for the #2 fuel oil shall be determined either by sampling on a semi-annual frequency or determined by sampling after each occasion that fuel is transferred to the storage tank from any other source. The latter requirement requires that after each addition of #2 fuel oil to the storage tank, sampling for nitrogen and sulfur content must be performed.

The sulfur and nitrogen content information obtained from this monitoring shall be used to document compliance with the limits stated in Conditions D.1.1, D.1.3, D.1.4, and D.1.5.

D.1.11 Sulfur Content and Nitrogen Content [326 IAC 12] [40 CFR 60, Subpart GG]

Compliance shall be determined utilizing the following option when combusting natural gas: Pursuant to 40 CFR 60.334, Subpart GG, the Permittee shall monitor the nitrogen and sulfur content of the fuel being fired in the turbine. Pursuant to 40 CFR 60.334 (b)(2), the custom monitoring schedule procedures approved by EPA on April 05, 2001 shall be accepted. Monitoring of these values shall be conducted as follows:

- (a) the nitrogen content monitoring requirements pursuant to 40 CFR 60.334 (b) for the natural gas being fired in the gas turbines are waived since there is no fuel-bound nitrogen in pipeline quality natural gas.
- (b) the sulfur content values for the natural gas shall be monitored on a semi-annual frequency. The sulfur content of the natural gas being fired in the gas turbines shall be determined by the ASTM methods D 1072-80, D 3031-81, D 4084-82, or D 3246-81. The applicable ranges of some ASTM methods mentioned are not adequate to measure the levels of sulfur in some fuel gases. Dilution of samples before analysis (with verification of the dilution ratio) may be used, subject to the Approval of the Administrator.

The sulfur and nitrogen content information obtained from this monitoring shall be used to document compliance with the limits stated in Conditions D.1.1, D.1.3, D.1.4, and D.1.5.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.12 Visible Emissions Notations

- (a) Visible emission notations of turbines T1 and T2 stack exhausts shall be performed once per shift during normal daylight operations when combusting #2 fuel oil. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.13 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1, D.1.3, D.1.4, D.1.5, D.1.6, D.1.7, D.1.9, D.1.10, and D.1.11, the Permittee shall maintain records in accordance with (1) through (2) below. Records maintained for (2) shall be taken according to Conditions D.1.10 and D.1.11 and shall be complete and sufficient to establish compliance with the sulfur and nitrogen content limits established in Conditions D.1.1, D.1.3, D.1.4, and D.1.5.

- (1) Data and results from the most recent stack test; and

Permit Reviewer: Patrick Burton

(2) All fuel nitrogen content and sulfur content monitoring data.

- (b) To document compliance with Condition D.1.1 the Permittee shall maintain records of fuel usage.
- (c) To document compliance with Condition D.1.9, the Permittee shall maintain records of fuel consumption and the ratio of water to fuel being fired in the turbine.
- (d) To document compliance with Condition D.1.10, the Permittee shall maintain records of fuel without intermediate bulk storage.
- (e) To document compliance with Condition D.1.12, the Permittee shall maintain records of visible emission notations of the turbine stack exhausts.
- (f) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.14 Reporting Requirements

- (a) A quarterly report of the information to document compliance with Condition D.1.1 shall be submitted to the addresses listed in Section C – General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

Two (2) 630 horsepower diesel engines used for turbine start-up, identified as D7 and D8, each exhausting at stacks, identified as S/V 5 and S/V 6, respectively.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Fuel Usage Limitations

The Permittee requests and accepts diesel fuel usage limits for diesel engines D7 and D8. The total diesel fuel usage for diesel engines D7 and D8 shall be limited to 1,099 gallons per 365 day rolling total. This is equivalent to 0.24 tons per year of NOx emissions.

D.2.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.3 Record Keeping Requirements

- (a) To document compliance with Condition D.2.1, the Permittee shall maintain records of fuel usage.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.2.4 Reporting Requirements

A quarterly report of the information to document compliance with Condition D.2.1 shall be submitted to the addresses listed in Section C – General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

Two (2) 300,000 gallon No. 2 fuel oil storage tanks, identified as FT10 and FT11.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 General Provisions Relating to NSPS [326 IAC 12-1][40 CFR Part 60, Subpart A]

The provisions of 40 CFR 60, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 12-1, apply to the facility described in this section except when otherwise specified in 40 CFR 60, Subpart Kb (Standards of Performance for Volatile Organic Liquid Storage Vessels).

D.3.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.3.3 New Source Performance Standard [326 IAC 12-1][40 CFR 60, Subpart Kb]

Pursuant to the New Source Performance Standard 40 CFR 60, Subpart Kb (Standards of Performance for Volatile Organic Liquid Storage Vessels) and 326 IAC 12,

- (a) The tank dimensions must be kept on file; and
- (b) Any fuel stored with vapor pressure exceeding 5.2 kPa shall be reported to IDEM, OAQ; and
- (c) The records required shall be kept for the life of the source.

SECTION E ACID RAIN PROGRAM CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

Two (2) 38.7 megawatt (net) simple cycle gas turbines using natural gas as the primary fuel with No. 2 fuel oil used as a backup identified as T1 and T2, and using a water injection system as control, with each turbine exhausting to stacks, identified as S/V 3 and S/V 4, respectively. When using natural gas, T1 and T2 each have a maximum heat input capacity of 431.3 MMBtu/hr. When using No. 2 fuel oil, T1 and T2 each have a maximum heat input capacity of 424.5 MMBtu/hr.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

E.1 Acid Rain Permit [326 IAC 2-7-5(1)(C)] [326 IAC 21] [40 CFR 72 through 40 CFR 78]

- (a) The Acid Rain Permit for this source, AR 095-11900-00051, issued on July 25, 2000 is incorporated by reference into this Part 70 permit. Pursuant to 326 IAC 21 (Acid Deposition Control), the Permittee shall comply with all provisions of the Acid Rain Permit issued for this source, and any other applicable requirements contained in 40 CFR 72 and 40 CFR 75 through 40 CFR 78.
- (b) Where an applicable requirement of the Clean Air Act is more stringent than an applicable requirement of regulations promulgated under Title IV of the Act, both provisions shall apply.

E.2 Title IV Emissions Allowances [326 IAC 2-7-5(4)] [326 IAC 21]

Emissions exceeding any allowances that the Permittee lawfully holds under the Title IV Acid Rain Program of the Clean Air Act are prohibited, subject to the following limitations:

- (a) No revision of this permit shall be required for increases in emissions that are authorized by allowances acquired under the Title IV Acid Rain Program, provided that such increases do not require a permit revision under any other applicable requirement.
- (b) No limit shall be placed on the number of allowances held by the Permittee. The Permittee may not use allowances as a defense to noncompliance with any other applicable requirement.
- (c) Any such allowance shall be accounted for according to the procedures established in regulations promulgated under Title IV of the Clean Air Act.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
and the
Anderson Office of Air Management**

**PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Indiana Municipal Power Agency
Source Address: 6035 Park Road, Anderson, Indiana 46001
Mailing Address: 11610 North College Avenue, Carmel, Indiana 46032
Part 70 Permit No.: T095-12389-00051

**This certification shall be included when submitting monitoring, testing
reports/results
or other documents as required by this permit.**

Please check what document is being certified:

- 9 Annual Compliance Certification Letter
- 9 Test Result (specify) _____
- 9 Report (specify) _____
- 9 Notification (specify) _____
- 9 Affidavit (specify) _____
- 9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:
Title/Position:
Phone:
Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967
and the**

**Anderson Office of Air Management
P.O. Box 2100
120 East 8th Street
Anderson, Indiana 46011
Phone: 765-648-6158
Fax: 765-648-5924**

**PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT**

Source Name: Indiana Municipal Power Agency
Source Address: 6035 Park Road, Anderson, Indiana 46001
Mailing Address: 11610 North College Avenue, Carmel, Indiana 46032
Part 70 Permit No.: T095-12389-00051

This form consists of 2 pages

Page 1 of 2

<p>This is an emergency as defined in 326 IAC 2-7-1(12) The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and The Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16</p>

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:

Permit Reviewer: Patrick Burton

Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A

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Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
and the
Anderson Office of Air Management
Part 70 Monthly Report**

Source Name: Indiana Municipal Power Agency
Source Address: 6035 Park Road, Anderson, Indiana 46001
Mailing Address: 11610 North College Avenue, Carmel, Indiana 46032
Part 70 Permit No.: T095-12389-00051
Facility: Gas Turbines (T1 and T2)
Parameter: Fuel Usage
Limit: The total combined fuel use in gas turbines T1 and T2 shall be limited as follows:
(1) When natural gas is the only fuel used, the fuel limit is
675.0 million standard cubic feet (MMSCF) per 365 day rolling total.
(2) When No. 2 fuel oil is the only fuel used, the fuel limit is
3.36 million gallons per 365 day rolling total.
(3) Fuel limit when both natural gas and No. 2 fuel oil are used during the 365 day period:
675.0 million standard cubic feet (MMCF) natural gas and 3.36 million gallons (MMgal) of No. 2
fuel oil per 365 day rolling total.

Month: _____ Year: _____

Day	Fuel Type a) Nat. Gas b) #2 Fuel oil	Fuel usage a) (CF/day) b) (Gal/day)	Usage for previous 365 day period	Water to fuel ratio	Sulfur content	Day	Fuel Type a) Nat. Gas b) #2 Fuel oil	Fuel usage a) (CF/day) b) (Gal/day)	Usage for previous 365 day period	Water to fuel ratio	Sulfur content
1						17					
2						18					
3						19					
4						20					

Permit Reviewer: Patrick Burton

5		21	
6		22	
7		23	
8		24	
9		25	
10		26	
11		27	
12		28	
13		29	
14		30	
15		31	
16			

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.

Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
and the
Anderson Office of Air Management
Part 70 Monthly Report**

Source Name: Indiana Municipal Power Agency
Source Address: 6035 Park Road, Anderson, Indiana 46001
Mailing Address: 11610 North College Avenue, Carmel, Indiana 46032
Part 70 Permit No.: T095-12389-00051
Facility: Diesel Engines (D7 and D8)
Parameter: Fuel Usage
Limit: The total fuel usage in diesel engines D7 and D8 shall be limited to 1,099 gallons of diesel fuel per 365 day rolling total.

Month: _____ Year: _____

Day	Fuel usage (gal/day)	Usage for previous 365 day period	Day	Fuel usage (gal/day)	Usage for previous 365 day period
1			17		
2			18		
3			19		
4			20		
5			21		

Permit Reviewer: Patrick Burton

6		22		
7		23		
8		24		
9		25		
10		26		
11		27		
12		28		
13		29		
14		30		
15		31		
16		no. of deviations		

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.

Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
and the
Anderson Office of Air Management**

**PART 70 OPERATING PERMIT
QUARTERLY DEVIATION and COMPLIANCE MONITORING REPORT**

Source Name: Indiana Municipal Power Agency
Source Address: 6035 Park Road, Anderson, Indiana 46001
Mailing Address: 11610 North College Avenue, Carmel, Indiana 46032
Part 70 Permit No.: T095-12389-00051

Months: _____ **to** _____ **Year:** _____

This report is an affirmation that the source has met all the requirements stated in this permit. This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	

Permit Reviewer: Patrick Burton

Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Form Completed By: _____
Title/Position: _____
Signature: _____
Date: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management
Office of Air Quality
and the Anderson Office of Air Management

Addendum to the
Technical Support Document for a Part 70 Operating Permit

Source Name: Indiana Municipal Power Agency
Source Location: 6035 Park Road, Anderson, Indiana 46011
County: Madison
SIC Code: 4911
Operation Permit No.: T095-12389-00051
Permit Reviewer: Patrick Burton

On September 11, 2000 the Office of Air Quality (OAQ) had a notice published in the *Herald Bulletin*, Anderson, Indiana, stating that Indiana Municipal Power Agency had applied for a Part 70 Operating Permit to operate a gas turbine electric generating facility. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On October 6, 2000 and November 21, 2001, Indiana Municipal Power Agency submitted comments on the proposed Part 70 permit. The summary of the comments is as follows:

Comment 1: Table of Contents

The Table of Contents in the draft permit do not match the specific conditions. For example, D.1.10 specifies NSPS Compliance Provisions in the Table of Contents, but D.1.10 in the permit describes Sulfur Dioxide Emissions and Sulfur content. IDEM should ensure that the Table of Contents match the permit terms.

Response 1: All changes made to the permit based on the comments received will be reflected in the Table of Contents.

Comment 2: Condition A.1 General Information

IDEM should change the contact person from Mr. John Fischer to Mr. Jack Alvey and the responsible official from Mr. Raj G. Rao to Ms. Gayle Mayo, Vice President Planning and Eng. In addition, the source phone number should be changed from (317) 575-3876 to (317) 575-9955.

Response 2: The changes have been made to the permit as follows:

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]
The Permittee owns and operates a gas turbine electric generating ~~facility~~ **plant**.

Responsible Official: ~~Mr. Raj G. Rao~~ **Ms. Gayle Mayo, Vice President Planning and Eng.**

Contact Person: ~~Mr. John R. Fischer~~ **Mr. Jack Alvey**
Phone Number: ~~(317) 575-3876~~ **(317) 575-9955**

Comment 3: Condition B.10(a) – Annual Compliance Certification. IMPA requests that the initial certifications cover the period from the time of permit issuance through the end of 2002. This would allow IMPA to submit one certification and not two (one under the FESOPs and one under these permits) for the 2001 time period. Accordingly, IMPA requests that Condition B.10(a) in both permits be modified as follows:

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of the final permit issuance through December 31 of ~~2002 the same year~~. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:
- Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-35909

Response 3: Pursuant to 326 IAC 2-7-6(5)(A) (Compliance Requirements), the source shall submit a compliance certification not less than annually or such more frequent periods as specified in the applicable requirements or by the Commissioner. There will be no changes to this condition in the final permit as a result of this comment.

Comment 4: Condition B.16 Deviation from Permit Requirements and Conditions
IMPA requests that the deviation reporting requirement be specified as a quarterly reporting requirement to be consistent with all other reporting requirements. IMPA understands that IDEM has agreed to this change in other permits. Accordingly, Condition B.16 should be modified as follows:

B.16 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Branch ~~Data Section~~, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Anderson Office of Air Management
P.O. Box 2100
120 East 8th Street
Anderson, Indiana 46011

~~within ten (10) calendar days from the date of the discovery of the deviation using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. except for the failure to perform the monitoring or record the information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report.~~

The notification by the Permittee does require the certification by the "responsible

official” as defined by 326 IAC 2-7-1(34).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:

- (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
- ~~(2) An emergency as defined in 326 IAC 2-7-1(12); or~~
- ~~(3)(2)~~ Failure to implement elements of the Preventive Maintenance Plan unless such failure has caused or contributed to a deviation.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation. **Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report**

- ~~(c) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. The notification does not need to be certified by the “responsible official” as defined by 326 IAC 2-7-1(34).~~

- ~~(d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.~~

Response 4: The following change has been made to Condition B.16 (now B.15) of the permit as a result of IDEM, OAQ Title V permit changes:

B.165 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

~~within ten (10) calendar days from the date of the discovery of the deviation, except for the failure to perform the monitoring or record the information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.~~ **using the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report.**

The notification by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:

- (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
- (2) An emergency as defined in 326 IAC 2-7-1(12); or
- (3) Failure to implement elements of the Preventive Maintenance Plan unless such failure has caused or contributed to a deviation.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

(c) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

~~(c) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. The notification does not need to be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).~~

~~(d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.~~

Comment 5: Condition C.1 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred pounds per hour
IDEM should delete this condition because IMPA's Richmond facility does not have any processes with a process weight rate of less than 100 pounds per hour.

Response 5: The following condition has been deleted from the permit, based on no processes with a process weight rate of less than 100 lbs/hr.

~~C.1 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]
Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.~~

The table of contents has been changed and the next conditions have been renumbered accordingly.

Comment 6: Condition C.9 Performance Testing
IDEM should modify this condition to be consistent with the applicable regulation and to confirm that the testing referred to in this condition is only testing that is required to demonstrate compliance or otherwise required to be approved by IDEM. Condition C.9(a) should be modified as follows:

C.89 Performance Testing [326 IAC 3-6]
(a) All testing **performed to determine compliance with applicable emission limitations contained in the permit, or for any other purpose requiring review and approval by OAQ**, shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.
A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Response 6: To clarify the following condition, language from 326 IAC 3-6 has been added to the permit as follows:

C.89 Performance Testing [326 IAC 3-6]
(a) All testing **performed to determine compliance with applicable emission limitations contained in the permit, or for any other purpose requiring review and approval by IDEM, OAQ, such as an alternate emission factor determination**, shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Comment 7: Condition C.14 Emergency Reduction Plans
IDEM should delete Condition C.14 relating to a requirement to submit an emergency reduction plan because IMPA's Richmond facilities have potential emissions less than 100 tons per year of any regulated air pollutant and therefore 326 IAC 1-5-2 does not apply.

Response 7: Enforceable limitations have been established in Section D.1.1 to restrict the potential sulfur dioxide (SO₂), particulate matter (PM), particulate matter less than ten (10) microns (PM₁₀), nitrogen oxides (NO_x) and carbon monoxide (CO) to less than 100 tons per year. Therefore, the following change has been made to the permit as a result of this comment.

~~C.14 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]
Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):~~

~~(a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.~~

~~(b) These ERPs shall be submitted for approval to:~~

~~Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015~~

~~and~~

~~Anderson Office of Air Management
P.O. Box 2100
120 East 8th Street
Anderson, Indiana 46011~~

~~within ninety (90) days after the date of issuance of this permit.~~

~~The ERP does require the certification by the responsible official as defined by 326 IAC 2-7-1(34).~~

~~(c) If the ERP is disapproved by IDEM, OAM, and the AOAM, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.~~

~~(d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.~~

~~(e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.~~

~~(f) Upon direct notification by IDEM, OAM, and the AOAM, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]~~

Comment 8: Condition C.18 Emission Statement
IDEM should delete this condition requiring the submission of an emission statement

because IMPA's Richmond facility has potential emissions of less than 100 tons per year of any regulated pollutant and therefore the requirement to submit an annual emission statement does not apply.

Response 8: Enforceable limitations have been established in Section D.1.1 to restrict the potential sulfur dioxide (SO₂), particulate matter (PM), particulate matter less than ten (10) microns (PM₁₀), nitrogen oxides (NO_x) and carbon monoxide (CO) to less than 100 tons per year. Therefore, the following change has been made to the permit as a result of this comment.

~~C.18 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)]
[326 IAC 2-6]~~

~~(a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:~~

~~(1) Indicate actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);~~

~~(2) Indicate actual emissions of other regulated pollutants (as defined by 326 IAC 2-7-1) from the source, for purposes of Part 70 fee assessment.~~

~~(b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:~~

~~Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015~~

~~and~~

~~Anderson Office of Air Management
P.O. Box 2100
120 East 8th Street
Anderson, Indiana 46011~~

~~The emission statement does require the certification by the responsible official as defined by 326 IAC 2-7-1(34).~~

~~(c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM and the AOAM on or before the date it is due.~~

Comment 9: Condition C.20 General Reporting Requirements
IMPA requests that the semi-annual compliance monitoring report be converted to quarterly reporting to be consistent with the various other reports required of IMPA. Also, Condition C.19 has been changed to indicate all forms require certification by the responsible official. Accordingly, Condition C.20 should be modified as follows:

C.1820 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

To affirm that the source has met all the compliance monitoring requirements stated in this permit

the source shall submit a **quarterly** ~~Semi-annual~~ Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported. The Compliance Monitoring Report shall include the certification by the ~~A~~responsible official~~@~~ as defined by 326 IAC 2-7-1(34).

- (d) Unless otherwise specified in this permit, ~~any~~ **all** reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. ~~The~~ All reports ~~do not~~ require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Response 9: The following changes have been made to the permit as a result of changes made to B.15 and the reporting form:

C.1720 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

- (a) ~~To affirm that the source has met all the compliance monitoring requirements stated in this permit the~~ The source shall submit a ~~Semi-Annual~~ **the attached Quarterly Deviation** and Compliance Monitoring Report, or its equivalent. Any deviation from ~~the permit~~ requirements and, the date(s) of each deviation, **the cause of the deviation, and the response steps taken** must be reported, ~~unless the deviation was reported in accordance with Section B - Deviations from Permit Requirements and Conditions.~~ This report shall be submitted within thirty (30) days of the end of the reporting period. The **Quarterly Deviation and** Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Comment 10: Condition C.17(a) – General Reporting Requirements. IMPA requests that the permits allow the quarterly compliance monitoring to be certified by delegated officials, as well as the responsible official. The regulations do not require that quarterly deviation and compliance monitoring reports be signed by the responsible official. This can be a time consuming burden and is not necessary if the responsible official delegates his authority to another IMPA official. Therefore, IMPA requests that for both permits, Condition C.17(a) be modified as follows:

- (a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34), **or other official with delegated authority from a responsible official.**

In addition, Condition C.17(g) – General Reporting Requirements. IMPA requests that the first quarterly report cover the quarter beginning with the issuance of the permits and ending at the end of the first quarter of 2002. Accordingly, for both permits, Condition C.17(g) should be modified as follows:

- (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on **March 31, 2002** ~~the last day of the reporting period.~~ Reporting periods are based on calendar **quarters** ~~years~~.

Response 10: Pursuant to 326 IAC 2-7-1(34)(D) (Definitions), the definition of “responsible official” includes the following:

For affected sources:

- (i) the designated representative for actions, standards, requirements, or prohibitions under Title IV of the CAA or the regulations promulgated thereunder; and
- (ii) the designated representative for any other purposes under a Part 70 permit.

Therefore, no changes are necessary to the permit.

Pursuant to 326 IAC 2-7-6(5)(A) (Compliance Requirements), the source shall submit a compliance certification not less than annually or such more frequent periods as specified in the applicable requirements or by the Commissioner. There will be no changes to this condition in the final permit as a result of this comment.

Comment 11: Condition D.1.2 PSD Minor Limit

IDEM should delete this condition because Condition D.1.1 already limits the emission from these facilities to less than 100 tons per year, and therefore the PSD minor limit set forth in D.1.2 is not necessary and should be deleted and the following paragraph added as follows:

~~D.1.2 PSD Minor Limit [326 IAC 2-2]~~

~~The nitrogen oxides emissions from gas turbine Nos. 1 and 2 shall not exceed 42 ppmdv at 15% oxygen for natural gas combustion and 65 ppmdv at 15% oxygen for No. 2 oil combustion. These limits restrict potential NO_x emissions to less than 100 tons per year, therefore the State and Federal Rules for PSD do not apply.~~

D.1.1 Fuel Usage Limitations

The total combined fuel use in gas turbines T1 and T2 shall be limited as follows:

These limits restrict the potential sulfur dioxide (SO₂), particulate matter (PM), particulate matter less than ten (10) microns (PM₁₀), nitrogen oxides (NO_x) and carbon monoxide (CO) to less than 100 tons per year.

Response 11: IDEM, OAQ included all old FESOP requirements per IMPA’s request. Since, the PSD Minor Limit is not necessary, because of the fuel usage limitation which limits PM₁₀, SO₂, NO_x and CO to less than 100 tons per year, the condition has been revised. In addition, conditions D.1.1 (a) and D.1.1 (b) have been revised in order to clarify that both fuel limits can be utilized per 365 day rolling total.

D.1.1 Fuel Usage Limitations

The total combined fuel use in gas turbines T1 and T2 shall be limited as follows:

- (a) ~~Fuel limit -~~ **When natural gas is the only fuel used, during the 365 day period: the fuel limit is 675.0 million standard cubic feet (MMSCF) per 365 day rolling total.**
- (b) ~~Fuel limit -~~ **When No. 2 fuel oil is the fuel used, during the 365 day period: the fuel limit is 3.36 million gallons per 365 day rolling total.**

These limits restrict the potential to emit of sulfur dioxide (SO₂), particulate matter (PM), particulate matter less than ten (10) microns (PM₁₀), nitrogen oxides (NO_x) and carbon monoxide (CO) to less than 100 tons per year. Thus, 326 IAC 2-2 does not apply.

Comment 12: Condition D.1.1 – (Fuel Usage Limitations) IMPA requests that the Anderson permit contain a fuel limit for both fuels, similar to the limit that is contained in the Centerville permit. IMPA requests that the following condition, which includes values taken from *Appendix A* of the Anderson FESOP, be added to Condition D.1.1 of the Anderson permit:

D.1.1 Fuel Usage Limitations

* * *

- (c) Fuel limit when both natural gas and No. 2 fuel oil are used during the 365 day period: 675 million standard cubic feet (MMCF) natural gas and 3.36 million gallons (MMgal) of No. 2 fuel oil per 365 day rolling total.**

Response 12: The following changes have been made to the permit:

- (c) Fuel limit when both natural gas and No. 2 fuel oil are used during the 365 day period: 675.0 million standard cubic feet (MMCF) natural gas and 3.36 million gallons (MMgal) of No. 2 fuel oil per 365 day rolling total.**

Comment 13: Condition D.1.4 New Source Performance Standard
IDEM should delete the last sentence of the referenced New Source Performance Standard because the sentence is not in the regulations and it incorrectly calculates emission limits for IMPA's units. Accordingly, Condition D.1.4 should be modified as follows:

D.1.4 New Source Performance Standard [326 IAC 12-1][40 CFR 60, Subpart GG]
Pursuant to 40 CFR 60, Subpart GG (Standards of Performance for Stationary Gas Turbines), the Permittee shall comply with the following limits:

- (1) limit nitrogen oxides emissions, as required by 40 CFR 60.332, to:

$$\text{STD} = 0.0075 \frac{(14.4)}{Y} + F,$$

where STD = allowable NO_x emissions (percent by volume at 15 percent oxygen on a dry basis).

Y = manufacturers rated heat rate at manufacturers rated load (kilojoules per watt hour) or, actual measured heat rate based on lower heating value of fuel as measured at actual peak load for the facility. The value of Y shall not exceed 14.4 kilojoules per watt hour.

F = NO_x emission allowance for fuel-bound nitrogen as defined in paragraph (a)(3) of 40 CFR 60.332.

- (2) limit sulfur dioxide emissions, as required by 40 CFR 60.333, to 0.015 percent by volume at 15 percent oxygen on a dry basis, or use natural gas fuel with a sulfur content less than or equal to 0.8 percent by weight.

~~Based on manufacturer's rated heat rate and estimated fuel specifications (nitrogen < 0.015%) the resulting NSPS based NO_x emissions would be 92 ppm_{dv} for natural gas combustion and 91 ppm_{dv} for No. 2 oil combustion.~~

Response 13: The last sentence was carried over from the Technical Support Document that clarified that the unit was in compliance. This sentence has been removed from the permit.

Comment 14: New Condition D.1.5 Sulfur Dioxide
IDEM should add a new condition that limits the sulfur content of any fuel to 0.3% by weight, as required by IMPA's FESOP. This new condition should provide:

D.1.5 Sulfur Dioxide

The sulfur content of any fuel used in the turbines (natural gas or oil) shall be limited to 0.3% by weight. This shall satisfy the requirements of 40 CFR 60.333.

Response 14: Since IMPA voluntarily requested to add a more stringent sulfur content condition, the following condition has been added to the permit as follows:

~~D.1.5 Sulfur Dioxide~~

~~Pursuant to Construction Permit 048-1841, issued on May 11, 1990, the sulfur content of any fuel used in the turbines (natural gas or oil) shall be limited to 0.3% by weight. This shall satisfy the requirements of 40 CFR 60.333.~~

D.1.5 Sulfur Dioxide [326 IAC 2-7-24] [40 CFR 60.333(b)] [326 IAC 7-1.1]

Pursuant to Construction Permit 048-1841, issued on May 11, 1990, the sulfur content of any fuel used in the turbines (natural gas or oil) shall be limited to 0.3% sulfur by weight. Pursuant to 326 IAC 2-7-24, compliance with this limitation shall satisfy the requirements of 40 CFR 60.333(b) and 326 IAC 7-1.1.

Comment 15: Existing Condition D.1.6 Sulfur Dioxide Emission Limitations

This condition should be deleted because the new Condition D.1.6 will establish a sulfur content limit of 0.3% by weight which is more stringent than the 0.5 lbs/mmBtu limit in the existing Condition D.1.6. Accordingly, existing Condition D.1.6 is unnecessary and should be deleted as follows:

~~D.1.6 Sulfur Dioxide Emission Limitations [326 IAC 7-1.1]~~

~~Pursuant to 326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations), the sulfur dioxide emissions from the 424.5 million (MM) Btu per hour turbines shall be limited to 0.5 pounds per million (MM) Btu heat input when combusting fuel oil.~~

Response 15: IMPA voluntarily requested to add a more stringent sulfur content limitation and IMPA is still subject to the provisions of 326 IAC 7-1.1. Therefore, pursuant to "streamlining requirements" in 326 IAC 2-7-24 the changes in the above comments have been made to the permit and the provisions of 326 IAC 7-1.1 (see Response #14) are referenced in Condition D.1.5 (Sulfur Dioxide). Additionally, the following changes to the permit have been added:

~~D.1.6 Sulfur Dioxide Emission Limitations [326 IAC 7-1.1]~~

~~Pursuant to 326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations), the sulfur dioxide emissions from~~

~~the 424.5 million (MM) Btu per hour turbines shall be limited to 0.5 pounds per million (MM) Btu heat input when combusting fuel oil.~~

Comment 16: New Condition D.1.7

IDEM should add an opacity limit for these units, as was included in the FESOP. A new Condition D.1.7 should be added as follows:

D.1.7 Opacity [326 IAC 5-1]

Pursuant to Construction Permit 048-1841, issued on May 11, 1990, visible emissions from the combustion turbine stacks, S/V3 and S/V4, shall be limited to twenty percent (20%) opacity.

Response 16: Construction permit 048-1841 was issued to the Anderson facility. Therefore, the language can be incorporated into this permit. As stated in Condition C.1, opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4. However, since IMPA has voluntarily requested a more stringent opacity limitation, the following condition has been added to the permit:

D.1.6 Opacity

Pursuant to Construction Permit 048-1841, issued on May 11, 1990, visible emissions from the combustion turbine stacks, S/V3 and S/V4, shall be limited to twenty percent (20%) opacity.

Comment 17: Condition D.1.10 NSPS Compliance Provisions

IDEM should modify Condition D.1.8(a) to reflect that the NOx emissions shall not exceed 42 ppm, not 15 ppm as listed, because 42 ppm is the number that is calculated under the formula. In addition, the fuel oil value (65 ppm) should be added. In addition, Condition D.1.8(b) should be modified to indicate that it only applies when the units are burning natural gas. As currently written, this condition could be construed to prohibit the use of alternate fuels. Accordingly, Condition D.1.8 should be modified as follows:

D.1.10 NSPS Compliance Provisions [40 CFR 60, Subpart GG]

- (a) The turbine shall comply with the nitrogen oxides standard in Condition D.1.4 when burning natural gas or fuel oil; and nitrogen oxide emissions shall not exceed **42 15 ppm when using natural gas, and 65 ppm when using fuel oil at with less than** 15% oxygen by volume at a peak load not to exceed 14.4 gigajoules per watt hour.
- (b) **When burning natural gas**, the turbine shall comply with the sulfur dioxide emissions standard by using pipeline supplied natural gas.
- (c) No alternate fuel burned in the gas turbine shall contain sulfur in excess of 0.8 percent by weight.

Response 17: D.1.10 (now D.1.8) NSPS Compliance Provisions [40 CFR 60, Subpart GG] condition (a) has been moved to D.1.4 (NOx Emissions Limitations) and revised to incorporate the reference to CP-048-1841. The source requested the lower limits in their 1989 construction permit application in consideration of manufacturer provided information, flexibility in facility

operations, and ease in monitoring compliance. In addition, the custom monitoring schedule procedures approved by EPA on April 05, 2001 has been added that state the required use of pipeline supplied natural gas to comply with the sulfur dioxide emissions standard. The changes are as follows:

D.1.10D.1.8 NSPS Compliance Provisions [40 CFR 60, Subpart GG]

~~(a) The turbine shall comply with the nitrogen oxides standard in Condition D.1.4 when burning natural gas or fuel oil; and nitrogen oxide emissions shall not exceed 15 ppm with less than 15% oxygen by volume at a peak load not to exceed 14.4 gigajoules per watt hour.~~

(b)(a) Pursuant to 40 CFR 60, Subpart GG and the custom monitoring schedule procedures approved by EPA on April 05, 2001, when combusting natural gas, the turbine shall comply with the sulfur dioxide emissions standard by using pipeline supplied natural gas..

~~(c)(b)~~ No alternate fuel burned in the gas turbine shall contain sulfur in excess of 0.8 percent by weight.

D.1.4 NOx Emissions Limitations

Pursuant to CP-048-1841, issued on May 11, 1990, the nitrogen oxide (NOX) emissions from the two (2) simple cycle gas turbines (T1 and T2) shall be limited to 42 parts per million dry volume (ppmdv) at 15 percent oxygen when combusting natural gas and 65 parts per million dry volume (ppmdv) at 15 percent oxygen when combusting fuel oil. [These limits are more stringent than the NSPS standards contained in 326 IAC 12 and 40 CFR 60.332 (a) (1) and (b)].

Comment 18: Condition D.1.10 40 CFR Part 60, Subpart GG Compliance Requirements Condition D.1.10(b) should be removed from this condition because it relates to acid rain requirements, not Subpart GG requirements. In addition, this condition should indicate that these requirements relate to CO2 emissions, not CO emission. Accordingly, IMPA would request that a new Condition D.1.10a be added for acid rain requirements, and that the D.1.10(b) be moved into that condition, as follows:

D.1.10 40 CFR Part 60, Subpart GG Compliance Requirements (Stationary Gas Turbines)

Pursuant to 40 CFR Part 60, Subpart GG (Stationary Gas Turbines), the Permittee shall monitor the nitrogen and sulfur content of the natural gas on a daily basis as follows:

(a) install a continuous monitoring system to monitor and record the fuel consumption and the ratio of water to fuel being fired in the turbine, as required by 40 CFR 60.334(a);

~~(b) Continuously monitor SO2, NOx and CO emissions per the requirements of 40 CFR Part 75. These requirements include, but are not limited to 40 CFR Parts 75.10, 75.11 and 75.12.~~

D.1.10a 40 CFR Part 75, Compliance Requirements

(a) Continuously monitor SO2, NOx and CO2 emissions per the requirements of 40 CFR Part 75. These requirements include, but are not limited to 40 CFR Parts 75.10,

75.11 and 75.12.

Response 18: The following changes have been made to condition D.1.10 (now D.1.9). Subpart (a) has been changed to remove the requirement to record and move this to the record keeping requirement condition. References to the source's Acid Rain Permit AR 095-11900-00051 monitoring requirements have not been added to this condition since the conditions of the Acid Rain Permit have already been added to this permit found in Appendix E.

D.1.109 40 CFR Part 60, Subpart GG Compliance Requirements (Stationary Gas Turbines) [40 CFR 60, Subpart GG]

Pursuant to 40 CFR Part 60, Subpart GG (Stationary Gas Turbines), the Permittee shall monitor **and record fuel consumption and the ratio of water to fuel being fired in the turbine as follows:** ~~the nitrogen and sulfur content of the natural gas on a daily basis as follows:~~

- (a) install a continuous monitoring system to monitor ~~and record~~ the fuel consumption and the ratio of water to fuel being fired in the turbine, as required by 40 CFR 60.334(a); .
- ~~(b) Continuously monitor SO₂, NO_x and CO emissions per the requirements of 40 CFR Part 75. These requirements include, but are not limited to 40 CFR Parts 75.10, 75.11 and 75.12.~~

Comment 19: Condition D.1.11 Sulfur Dioxide Emissions and Sulfur Content
IDEM should delete this condition because the requirements under Condition D.1.12 are sufficient to demonstrate compliance with the new Condition D.1.5, and the existing Conditions D.1.5 and D.1.10 should be deleted because they are less stringent than Conditions D.1.5 and D.1.11. Accordingly, Condition D.1.11 should be deleted as follows:

~~D.1.11 Sulfur Dioxide Emissions and Sulfur Content~~

~~Compliance shall be determined utilizing one of the following options.~~

- ~~(a) Pursuant to 326 IAC 3-7-4, the Permittee shall demonstrate that the sulfur dioxide emissions do not exceed five tenths (0.5) pounds per million Btu heat input by:
 - ~~(1) Providing vendor analysis of fuel delivered, if accompanied by a certification;~~
 - ~~(2) Analyzing the oil sample to determine the sulfur content of the oil via the procedures in 40 CFR 60, Appendix A, Method 19.
 - ~~(A) Oil samples may be collected from the fuel tank immediately after the fuel tank is filled and before any oil is combusted; and~~
 - ~~(B) If a partially empty fuel tank is refilled, a new sample and analysis would be required upon filling; or~~~~~~
- ~~(b) Compliance may also be determined by conducting a stack test for sulfur dioxide emissions from the thirteen (13) MMBtu per hour heater, using 40 CFR 60, Appendix A, Method 6 in accordance with the procedures in 326 IAC 3-6.~~

~~A determination of noncompliance pursuant to either of the methods specified in (a) or (b) above~~

~~shall not be refuted by evidence of compliance pursuant to the other method.~~

Response 19: D.1.11 (Sulfur Dioxide and Sulfur Content) and D.1.12 (Sulfur Content and Nitrogen Content) have been superseded by the EPA approval letter dated April 5, 2001. D.1.11 and D.1.12 have been changed and replaced with D.1.10 and D.1.11 in order to incorporate the specific rule citations and provisions of the April 5, 2001 EPA approval letter. Below are the following changes:

~~D.1.11 Sulfur Dioxide Emissions and Sulfur Content~~

~~Compliance shall be determined utilizing one of the following options.~~

~~(a) Pursuant to 326 IAC 3-7-4, the Permittee shall demonstrate that the sulfur dioxide emissions do not exceed five-tenths (0.5) pounds per million Btu heat input by:~~

~~(1) Providing vendor analysis of fuel delivered, if accompanied by a certification;~~

~~(2) Analyzing the oil sample to determine the sulfur content of the oil via the procedures in 40 CFR 60, Appendix A, Method 19.~~

~~(A) Oil samples may be collected from the fuel tank immediately after the fuel tank is filled and before any oil is combusted; and~~

~~(B) If a partially empty fuel tank is refilled, a new sample and analysis would be required upon filling; or~~

~~(b) Compliance may also be determined by conducting a stack test for sulfur dioxide emissions from the thirteen (13) MMBtu per hour heater, using 40 CFR 60, Appendix A, Method 6 in accordance with the procedures in 326 IAC 3-6.~~

~~A determination of noncompliance pursuant to either of the methods specified in (a) or (b) above shall not be refuted by evidence of compliance pursuant to the other method.~~

~~D.1.12 Sulfur Content and Nitrogen Content [326 IAC 12] [40 CFR 60, Subpart GG]~~

~~Pursuant to 40 CFR 60, Subpart GG, the Permittee shall monitor the nitrogen and sulfur content of the fuel being fired in the turbine. The frequency of determination of these values shall be as follows:~~

~~(a) If the turbine is supplied its fuel from a bulk storage tank, the values shall be determined on each occasion that fuel is transferred to the storage tank from any other source.~~

~~(b) If the turbine is supplied its fuel without intermediate bulk storage the values shall be determined and recorded daily. Owners, operators or fuel vendors may develop custom schedules for determination of the values based on the design and operation of the affected facility and the characteristics of the fuel supply. These custom schedules shall be substantiated with data and must be approved by the Administrator before they can be used to comply with the monitoring requirements.~~

~~_____ (c) determine the nitrogen content of the natural gas/ fuel oil being fired in the gas turbines by using analytical methods and procedures that are accurate to within 5 percent and are approved by the Administrator.~~

~~(d) determine the sulfur content of the natural gas/ fuel oil being fired in the gas turbines by the ASTM methods D 1072-80, D 3031-81, D 4084-82, or D 3246-81. The applicable ranges of some ASTM methods mentioned are not adequate to measure the levels of sulfur in some fuel gases. Dilution of samples before analysis (with verification of the dilution ratio) may be used, subject to the Approval of the Administrator.~~

~~The sulfur and nitrogen content information obtained from this monitoring shall be used to document compliance with the limits stated in Conditions D.1.2, D.1.4, D.1.5 and D.1.6.~~

D.1.10 Sulfur Content and Nitrogen Content [326 IAC 12] [40 CFR 60, Subpart GG]

Compliance shall be determined utilizing the following option when combusting fuel oil: Pursuant to 40 CFR 60.334, Subpart GG, the Permittee shall monitor the nitrogen and sulfur content of the fuel being fired in the turbine. Pursuant to 40 CFR 60.334 (b)(2), the custom monitoring schedule procedures approved by EPA on April 05, 2001 shall be accepted. Monitoring of these values shall be conducted as follows:

- (a) the nitrogen and sulfur content values for the #2 fuel oil shall be determined either by sampling on a semi-annual frequency or determined by sampling after each occasion that fuel is transferred to the storage tank from any other source. The latter requirement requires that after each addition of #2 fuel oil to the storage tank, sampling for nitrogen and sulfur content must be performed.**

The sulfur and nitrogen content information obtained from this monitoring shall be used to document compliance with the limits stated in Conditions D.1.1, D.1.3, D.1.4, and D.1.5.

D.1.11 Sulfur Content and Nitrogen Content [326 IAC 12] [40 CFR 60, Subpart GG]

Compliance shall be determined utilizing the following option when combusting natural gas: Pursuant to 40 CFR 60.334, Subpart GG, the Permittee shall monitor the nitrogen and sulfur content of the fuel being fired in the turbine. Pursuant to 40 CFR 60.334 (b)(2), the custom monitoring schedule procedures approved by EPA on April 05, 2001 shall be accepted. Monitoring of these values shall be conducted as follows:

- (a) the nitrogen content monitoring requirements pursuant to 40 CFR 60.334 (b) for the natural gas being fired in the gas turbines are waived since there is no fuel-bound nitrogen in pipeline quality natural gas.**
- (b) the sulfur content values for the natural gas shall be monitored on a semi-annual frequency. The sulfur content of the natural gas being fired in the gas turbines shall be determined by the ASTM methods D 1072-80, D 3031-81, D 4084-82, or D 3246-81. The applicable ranges of some ASTM methods mentioned are not adequate to measure the levels of sulfur in some fuel gases. Dilution of samples before analysis (with verification of the dilution ratio) may be used, subject to the Approval of the Administrator.**

The sulfur and nitrogen content information obtained from this monitoring shall be used to document compliance with the limits stated in Conditions D.1.1, D.1.3, D.1.4, and D.1.5.

This provision should include under D.1.12(d) the test method for oil which is D 1552-90, which is allowed by the acid rain requirements, and should reference method D 1945-95 which is the method used to determine sulfur content in the natural gas. Accordingly, Condition D.1.12(d) should be modified as follows:

D.1.12 Sulfur Content and Nitrogen Content [326 IAC 12] [40 CFR 60, Subpart GG]

- (d) **The Permittee shall** determine the sulfur content of the natural gas being fired in the gas turbines by the ASTM methods **D 1945-95**, D 1072-80, D 3031-81, D 4084-82, ~~or D 3246-81, or D 1552-90(for oil)~~. The applicable ranges of some ASTM methods mentioned are not adequate to measure the levels of sulfur in some fuel gases. Dilution of samples before analysis (with verification of the dilution ratio) may be used, subject to the Approval of the Administrator.

The sulfur and nitrogen content information obtained from this monitoring shall be used to document compliance with the limits stated in Conditions D.1.1, D.1.2, D.1.4, D.1.5 and D.1.6.

Response 20: 40 CFR 60, Subpart GG only references test methods for natural gas. Also, test method D 1945-95 is not listed in the rule. Therefore, no change shall be made to the permit as a result of the above comment.

Comment 21: Condition D.1.14(a) (now Condition D.1.15(a)) Record Keeping Requirements IDEM should delete Condition D.1.14(a)(2) which requires records of all continuous emissions monitoring data to be maintained because no continuous monitor is operated for these units and none is required. Accordingly, Condition D.1.14 should be modified as follows:

D.1.1544 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.2, D.1.3, D.1.4, D.1.5, D.1.6, D.1.7, D.1.9 and D.1.10, the Permittee shall maintain records in accordance with (1) through ~~(3)~~ **(2)** below. Records maintained for ~~(3)~~ **(2)** shall be taken according to Conditions ~~D.1.13~~ **D.1.11 and D.1.12** and shall be complete and sufficient to establish compliance with the sulfur and nitrogen content limits established in Conditions D.1.2, D.1.4, D.1.5 and D.1.6.

- (1) Data and results from the most recent stack test;
~~(2) All continuous emissions monitoring data; and~~
~~(2)(3)~~ All fuel nitrogen content and sulfur content monitoring data.

Response 21: The following changes have been made to the permit Condition D.1.14 (now D.1.13) to remove the record keeping requirements for continuous emissions monitoring, to add record keeping requirements for monitoring fuel consumption and water to fuel ratio, and to incorporate the changes as a result of EPA approval letter dated April 5, 2001. Pursuant to 40 CFR 75 Appendix E, the source submitted the results of the optional NOx emissions estimation protocol monitoring system. On December 6, 2000 OAQ reviewed and approved IMPA's monitoring systems report for the purposes of the Part 75 Acid Rain program. Pursuant to 326 IAC 10-4-1(b)(3)(B)(i), NOx CEMS are not required. The report summarized the tests that were performed on Units 1 and 2 at IMPA-Anderson Station on July 11-13, 2000 in order to determine the estimation curves by establishing a ratio between fuel usage and the NOx/SO2 emissions on each of the turbines. NOx is the primary

pollutant the sources fuel usage limits are based upon in the Title V permit. The estimations demonstrated in the report provide for the determination that CEMs are not required.

D.1.143 Record Keeping Requirements

- (a) To document compliance with Conditions **D.1.1**, ~~D.1.2~~, D.1.3, D.1.4, **D.1.5**, D.1.6, **D.1.7**, D.1.9, ~~and D.1.10~~, **and D.1.11** the Permittee shall maintain records in accordance with (1) through (32) below. Records maintained for (32) shall be taken according to Conditions **D.1.10** and D.1.113 and shall be complete and sufficient to establish compliance with the sulfur and nitrogen content limits established in Conditions **D.1.1**, ~~D.1.2~~, **D.1.3**, D.1.4, **and** D.1.5, ~~and D.1.6~~.
- (1) Data and results from the most recent stack test; **and**
 - (2) All ~~continuous emissions monitoring data; and~~
 - (3) ~~All~~ fuel nitrogen content and sulfur content monitoring data.
- (b) To document compliance with Condition D.1.1 the Permittee shall maintain records of fuel usage.
- (c) **To document compliance with Condition D.1.9, the Permittee shall maintain records of fuel consumption and the ratio of water to fuel being fired in the turbine.**
- ~~(c)~~(d) To document compliance with Condition D.1. ~~1012~~, the Permittee shall maintain records of fuel without intermediate bulk storage.
- ~~(d)~~(e) To document compliance with Condition D.1. ~~1213~~, the Permittee shall maintain records of visible emission notations of the turbine stack exhausts.
- ~~(e)~~(f) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Comment 22: Part 70 Quarterly Report (page 37 of 38) PSD Minor Limit
IDEM should delete the report for on page 37 of 38 because the PSD limit is sufficiently guaranteed by the potential emissions described in Condition D.1.1 and the form set out on page 36 of 38. Accordingly, this PSD minor permit form should be deleted.

Response 22: The Quarterly report form for the PSD Minor Limit has been deleted from the permit since the reports of fuel usage are sufficient to establish the status of compliance with regards to the PSD limit.

Comment 23: Technical Support Document (page 5 of 8) Federal Rule Applicability Section (d) which references continuous emissions monitors should be deleted since no continuous emissions monitors are required.

Response 23: The OAQ prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision. See Response #21.

Comment 24: Technical Support Document (page 7 of 8) Compliance Requirements Section (2)(b)
This provision should be modified as requested in the permit related to Condition D.1.12 to reflect that sulfur and nitrogen contents in natural gas are provided by the supplier because pipeline natural gas is received.

Response 24: The OAQ prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision. However, the TSD should have not included the Sulfur Content and Nitrogen Content Condition in the Compliance Requirements Section of the TSD, because these conditions are Compliance Determination conditions, not compliance monitoring conditions.

Comment 25: Technical Support Document General
IMPA requests that the Technical Support Document be modified to reflect all the changes proposed in the above comments on the body of the permit.

Response 25: The OAQ prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

Upon further review, the OAQ has decided to make the following revisions to the permit (bolded language has been added, the language with a line through it has been deleted). The Table Of Contents has been modified to reflect these changes.

1. The following changes have been made to the reporting forms to incorporate changes made to the B.14 (now B.15) Deviations condition, C.20 (now C.17) General Reporting Requirements condition and D.1.1 Fuel Usage Limitations condition:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
COMPLIANCE BRANCH
100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967**

PART 70 OPERATING PERMIT EMERGENCY/DEVIATION EMERGENCY OCCURRENCE REPORT

Source Name: Indiana Municipal Power Agency
Source Address: 46035 Park Road, Anderson, Indiana 46011
Mailing Address: 11610 North College Avenue, Carmel, Indiana 46032
Part 70 Permit No.: T095-12389-00051

This form consists of 2 pages

Page 1 of 2

~~Check either No. 1 or No. 2~~ 1. This is an emergency as defined in 326 IAC 2-7-1(12)
The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
The Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16

~~2. This is a deviation, reportable per 326 IAC 2-7-5(3)(C)
The Permittee must submit notice in writing within ten (10) calendar days~~

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency/Deviation Emergency:
Describe the cause of the Emergency/Deviation Emergency:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency/Deviation Emergency started:
Date/Time Emergency/Deviation Emergency was corrected:
Was the facility being properly operated at the time of the emergency/deviation emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency/deviation emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:

If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____
Title / Position: _____
Date: _____
Phone: _____

A certification is not required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT
~~SEMI-ANNUAL~~ QUARTERLY DEVIATION and COMPLIANCE MONITORING
REPORT**

Source Name: Indiana Municipal Power Agency
Source Address: 46035 Park Road, Anderson, Indiana 46011
Mailing Address: 11610 North College Avenue, Carmel, Indiana 46032
Part 70 Permit No.: T095-12389-00051

Months: _____ to _____ Year: _____

This report is an affirmation that the source has met all the ~~compliance monitoring~~ requirements stated in this permit. This report shall be submitted ~~semi-annually~~ **quarterly** based on a calendar year. Any deviation from the ~~compliance monitoring~~ requirements, and the date(s) of each deviation, **the probable cause of the deviation, and the response steps taken** must be reported. **Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report.** Additional pages may be attached if necessary. ~~This form can be supplemented by attaching the Emergency/Deviation Occurrence Report.~~ If no deviations occurred, please specify in the box marked A. No deviations occurred this reporting period.

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.

Compliance Monitoring Requirement
(e.g. Permit Condition D.1.3)

Number of Deviations

Date of each Deviation

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

Form Completed By: _____
Title/Position: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
and the
Anderson Office of Air Management
Part 70 Monthly Report**

Source Name: Indiana Municipal Power Agency
Source Address: 6035 Park Road, Anderson, Indiana 46001
Mailing Address: 11610 North College Avenue, Carmel, Indiana 46032
Part 70 Permit No.: T095-12389-00051
Facility: Gas Turbines (T1 and T2)
Parameter: Fuel Usage
Limit: The total combined fuel use in gas turbines T1 and T2 shall be limited as follows:
(1) ~~Fuel limit when natural gas is the only fuel used, during the 365 day period:~~
the fuel limit is 675.0 million standard cubic feet (MMSCF) per 365 day rolling total.
(2) ~~Fuel limit when No. 2 fuel oil is the only fuel used, during the 365 day period:~~
the fuel limit is 3.36 million gallons per 365 day rolling total.
(3) **Fuel limit when both natural gas and No. 2 fuel oil are used during the 365 day period:**
675.0 million standard cubic feet (MMCF) natural gas and 3.36 million gallons (MMgal) of No. 2 fuel oil per 365 day rolling total.

2. All references to the Office of Air Quality (OAQ) have been changed to the Office of Air Quality (OAQ), since the official name change became effective January, 1, 2001.

3. Condition A.1 (General Information)
"Minor Source, Section 112 of the Clean Air Act" has been added.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

Source Status: Part 70 Permit Program pursuant to the Acid Rain Program
Minor Source under PSD Rules
Minor Source, Section 112 of the Clean Air Act

4. Condition A.4 (Part 70 Permit Applicability) has been changed in order to clarify the source's minor source status

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22); however, the source has requested to ~~keep the FESOP095-5162-00040 limits~~ **maintain a PSD Minor Source**;

5. Condition B.1 (Permit No Defense)

This condition has been deleted from the permit, since this is not listed in IC 13, IDEM does not have the general authority pursuant to 326 IAC 2-7-15. Therefore the condition has been removed and most of the language transferred to Condition B.14 (now B.13)(Permit Shield) under that authority as follows:

~~B.1 Permit No Defense [IC 13]~~

- ~~(a) Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7.~~
- ~~(b) This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with 326 IAC 2-7-15, as set out in this permit in the Section B condition entitled ~~IPermit Shield.~~@~~

B.1314 Permit Shield [326 IAC 2-7-15] **[326 IAC 2-7-20] [326 IAC 2-7-12]**

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. **The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.**

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

6. B.3 (now B.2)(Permit Term) language has been added to clarify that amendments, revisions or modifications do not extend the expiration date of the permit. The expiration date will always be 5 years from the issuance date of the original permit. The expiration date will now be typed in the signature box as well.

B.32 Permit Term [326 IAC 2-7-5(2)]

This permit is issued for a fixed term of five (5) years from the ~~effective~~ **original** date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. **Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.**

7. B.8 (now B.7) (Duty to Supplement and Provide Information) The condition has been reworded to match the language in the rule. Also, Condition B.7 was revised to change a rule reference. Subpart (c) references 326 IAC 17. This rule was repealed by the Air Pollution Control Board on January 26, 2000. The new rule reference has been added as follows:
- B.87 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)] **[326 IAC 2-7-6(6)]**

- (b) The Permittee shall furnish to IDEM, OAQ, and the AOAM within a reasonable time, any information that IDEM, OAQ, and the AOAM may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). **Upon request, the Permittee shall also furnish to IDEM, OAQ, and the AOAM copies of records required to be kept by this permit or, for information claimed to be confidential, the Permittee may furnish such records directly to the U. S. EPA along with a claim of confidentiality. [326 IAC 2-7-5(6)(E)]**
- (c) ~~Upon request, the Permittee shall also furnish to IDEM, OAQ, and the AOAM copies of records required to be kept by this permit. The Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. If requested by IDEM, OAQ, or the U.S. EPA, to~~ **When furnishing** copies of requested records directly to U. S. EPA, ~~then the Permittee must furnish record directly to the U. S. EPA.~~ The Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.
8. B.9 (now B.8) (Compliance with Permit Conditions) (c) has been added to clarify that an emergency does constitute a defense in an enforcement action if the Permittee complies with the emergency procedures. In addition, (a) has been changed so the condition would be consistent with the language in the rule.
- B.98 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]
- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit, ~~except those specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act and is grounds for:~~
- (b) **Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act.**
- ~~(b)(c)~~ It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- ~~(c)(d)~~ **An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.**
9. B.10 (now B.9) (Certification) (b) has been modified to clarify when a certification is needed.

B.409 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

- (b) One (1) certification shall be included, ~~on~~ **using** the attached Certification Form, with each submittal **requiring certification**.

10. B.11 (now B.10) (Annual Compliance Certification) paragraph (a) has been revised to clarify that the initial certification is from the date of issuance until Dec. 31. Paragraph (c) has been revised so that it matches the language in the rule.

B.4410 Annual Compliance Certification [326 IAC 2-7-6(5)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. **The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent** ~~The certifications~~ shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management
Compliance ~~Data Section~~ **Branch**, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

- (c) The annual compliance certification report shall include the following:

- (3) Whether compliance was ~~based on~~ continuous or intermittent ~~data~~;
(4) The methods used for determining ~~the~~ compliance **status** of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and

11. B.12 (now B.11) (Preventive Maintenance Plan) the record keeping requirements have been added to this condition.

B.4211 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within **ninety (90) days** after issuance of this permit, including the following information on each facility:

- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
- (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
- (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond ~~it's~~ the **Permittee's** control, the PMPs cannot be prepared and

maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

- (d) **Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner or the AOAM makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or the AOAM within a reasonable time.**

12. B.13 (now B.12) (Emergency Provisions) a reference to the Emergency Occurrence Report Form has been added to B.13(b)(5). The emergency form is for emergencies only, and is no longer an emergency and deviation form. All deviations will now be reported on the Quarterly Deviation and Compliance Monitoring Report. Paragraph (d) part of the first sentence has been deleted. Since we know it is a TV source, then we also know the malfunction rule has been superseded by the emergency rule. Paragraph (f) "compliance" has been changed to "accordance".

B.1312 Emergency Provisions [326 IAC 2-7-16]

(b)

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted **the attached Emergency Occurrence Report Form or its equivalent** notice, either ~~in writing by mail or facsimile, of the emergency to:~~

- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions) ~~for sources subject to this rule after the effective date of this rule.~~ This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

- (f) Failure to notify IDEM, OAQ, and the AOAM by telephone or facsimile of an emergency lasting more than one (1) hour in ~~compliance~~ **accordance** with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.

13. B.17 (now B.16) (Permit Modification, Reopening, Revocation and Reissuance, or Termination) the "and" has been changed to "or" since the reopening could be done by either the local or the state agency.

**B.1716 Permit Modification, Reopening, Revocation and Reissuance, or Termination
[326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]**

- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, **or** the AOAM at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, **or** the AOAM may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

14. B.19 (now B.18) (Permit Amendment or Modification) 326 IAC 2-7-4(f) requires all applications to be certified by the responsible official, therefore this condition has been revised to clarify that. EPA has also requested this change. Also, Condition B.19 has been changed to replace “should” with “shall” in subpart (b). The Office of Legal Counsel has advised that the use of the word “shall” is more enforceable and will prevent sources from indicating they aren’t required to certify.

B.1918 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (b) Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Anderson Office of Air Management
P.O. Box 2100
120 East 8th Street
Anderson, Indiana 46011

Any such application ~~should~~ **shall** be certified by the “responsible official” as defined by 326 IAC 2-7-1(34) ~~only if a certification is required by the terms of the applicable rule.~~

15. B.21 (now B.20) (Operational Flexibility) (b) has been reorganized. Paragraph (b)(1) was taken out so the condition would be consistent with the language in the rule. Also, Condition B.21 has been changed to clarify the reason a certification is not required.

B.2420 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). ~~and the following additional conditions:~~

~~(1) The permit shield, described in 326 IAC 2-7-15, shall not apply to any change made under 326 IAC 2-7-20(b).~~

~~(2)~~ For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

~~(A)~~**(1)** A brief description of the change within the source;

~~(B)~~**(2)** The date on which the change will occur;

~~(C)~~**(3)** Any change in emissions; and

~~(D)~~**(4)** Any permit term or condition that is no longer applicable as a result of the

change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification ~~which shall be submitted~~ by the Permittee does not require the certification by the ~~A~~responsible official~~@~~ as defined by 326 IAC 2-7-1(34).

16. B.22 (now B.21) (Source Modification Requirement) 326 IAC 2 has been added to make the condition more complete. The language "applicable provisions" has been removed because it is unnecessary.

~~B.22~~**21** Source Modification Requirement [326 IAC 2] [326 IAC 2-7-10.5]
A modification, construction, or reconstruction is governed by ~~the applicable provisions of 326 IAC 2 and 326 IAC 2-7-10.5.~~

17. B.23 (now B.22) (Inspection and Entry) Model update and "at reasonable times" has been deleted because neither the rule nor the statute limit the agency. IDEM, U.S. EPA, or an authorized representative can ask for those things at any time.

~~B.23~~**22** Inspection and Entry [326 IAC 2-7-6(2)] **[IC 13-14-2-2]**
Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, AOAM, U.S. EPA, or an authorized representative to perform the following:

- (b) Have access to and copy, ~~at reasonable times,~~ any records that must be kept under the conditions of this permit;
- (c) Inspect, ~~at reasonable times,~~ any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, ~~at reasonable times,~~ substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.
~~[326 IAC 2-7-6(6)]~~

18. B.24 (now B.23) (Transfer of Ownership or Operational Control) 326 IAC 2-7-4(f) requires all applications to be certified by the responsible official, therefore this condition has been revised to clarify that. EPA has also requested this change.

~~B.24~~**23** Transfer of Ownership or Operational Control [326 IAC 2-7-11]

- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Anderson Office of Air Management
P.O. Box 2100
120 East 8th Street
Anderson, Indiana 46011

The application which shall be submitted by the Permittee does ~~not~~ require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

19. B.25 (now B.24) (Annual Fee Payment) add the following rule cite to paragraph (a).

B.2524 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, and the AOAM within thirty (30) calendar days of receipt of a billing. **Pursuant to 326 IAC 2-7-19(b)**, if the Permittee does not receive a bill from IDEM, OAQ, or the AOAM, the applicable fee is due April 1 of each year.

20. C.6 (now C.5) (Operation of Equipment) the following revisions were made to clarify the condition.

C.65 Operation of Equipment [326 IAC 2-7-6(6)]

Except as otherwise provided **by statute, rule, or** in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

21. C.7 (now C.6) (Stack Height) language has been added to clarify which parts of 326 IAC 1-7 are not federally enforceable.

C.76 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted. **The provisions of 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4(d), (e), and (f), and 326 IAC 1-7-5(d) are not federally enforceable.**

22. C.8 (now C.7) (Asbestos Abatement Projects) the rule cite in the title was changed to make it more generalized. Also, Condition C.8 (now C.7) has been revised to clarify the enforceability of accreditation. 326 IAC 14-10 (Emission Standards for Asbestos) was not submitted as a SIP and not approved. Therefore, this requirement that an inspector be "Indiana" accredited cannot be

federally enforceable. However, the requirement that the inspector be accredited is a provision of 40 CFR 61, Subpart M.

C.87 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] ~~[40 CFR 61.140]~~ [40 CFR 61, Subpart M]

- (f) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited, **pursuant to the provisions of 40 CFR 61, Subpart M**, is federally enforceable.

23. C.9 (now C.8) (Performance Testing) "within" has been changed to "not later than" to be consistent with 326 IAC 3-6.

C.98 Performance Testing [326 IAC 3-6]

- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ ~~within~~ **not later than** forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation ~~within~~ **not later than** five (5) days prior to the end of the initial forty-five (45) day period.

24. C.11 (now C.10) (Compliance Monitoring) there are times when compliance monitoring is required by a MACT that the source does not have to comply with yet. Therefore, language has been added to clarify that the permit will specify when CM doesn't have to start in 90 days. The same idea applies to new units, if the MACT doesn't apply yet, we would not expect the source to start compliance monitoring.

C.4110 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Anderson Office of Air Management
P.O. Box 2100

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

25. C.12 (now C.11) (Maintenance of Emission Monitoring Equipment) the following changes have been made:

C.1211 Maintenance of Emission Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]

- (a) In the event that a breakdown of the emission monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less **often** than ~~one (1)~~ **once an** hour until such time as the continuous monitor is back in operation.

26. C.13 (now C.12) (Monitoring Methods) the following rule cites have been added.

C.1312 Monitoring Methods [326 IAC 3] **[40 CFR 60] [40 CFR 63]**

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, **40 CFR 60 Appendix B, 40 CFR 63**, or other approved methods as specified in this permit.

27. Condition C.15 (now C.13) (Risk Management Plan) has been changed to reflect that IDEM, OAQ has not received a RMP from the source. Therefore, (c) has been deleted.

C.1513 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

- (b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP). ~~and~~

- ~~(c) A verification to IDEM, OAM, and the AOAM that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.~~

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

28. C.16 (now C.14) (Compliance Monitoring Plan - Failure to Take Response Steps) minor grammatical changes were made. (a) "of" was added. (c) "or" has been replaced with a period. (f) "(5%)" has been added to be consistent with the rest of the permit. Also, changes were made to (a)(5) and (f) due to frequently asked questions. Also, Condition C.18 has been changed to remove a reference in (a)(4) to a Condition that no longer exists.

C.14 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. The compliance monitoring plan can be either an entirely new document, consist in whole ~~of~~ information contained in other documents, or consist of a combination of new information and information contained in other documents. If the compliance monitoring plan incorporates by reference information contained in other documents, the Permittee shall identify as part of the compliance monitoring plan the documents in which the information is found. The elements of the compliance monitoring plan are:

- (4) The Record Keeping and Reporting Requirements in Section C (~~Monitoring Data Availability~~, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and

- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to take reasonable response steps ~~shall~~ **may** constitute a violation of the permit.

- (c) Upon investigation of a compliance monitoring excursion, the Permittee is excused from taking further response steps for any of the following reasons:

- (1) A false reading occurs due to the malfunction of the monitoring equipment. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
- (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied. ~~or~~
- (3) An automatic measurement was taken when the process was not operating. ~~or~~
- (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.

- (f) ~~If for reasons beyond its control, the Permittee fails to perform the monitoring and record keeping as required by Section D, then the reasons for this must be recorded.~~

- (1) At its discretion, IDEM may excuse **the Permittee's failure to perform the monitoring and record keeping as required by Section D, if the Permittee provides such failure providing adequate justification is documented and documents that such failures do not exceed five percent (5%) of the operating time in any quarter.**

- (2) Temporary, unscheduled unavailability of qualified staff shall be considered a valid

reason for failure to perform the monitoring or record keeping requirements in Section D.

29. C.17 (now C.15) (Actions Related to Noncompliance Demonstrated by a Stack Test) "corrective actions" has been changed to "response actions" to be consistent with the rest of the permit.

C.4715 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]
[326 IAC 2-7-6]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate ~~corrective~~ **response** actions. The Permittee shall submit a description of these ~~corrective~~ **response** actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the ~~corrective~~ **response** actions are being implemented.

30. C.19 (now C.16) (General Record Keeping Requirements) "monitoring" was removed so that the condition will seem more generalized to all record keeping, "reports" was added to clarify that the source must keep copies of those as well. (b) and (c) have been removed because they were unnecessary, since any requested reporting is listed in specific D-sections..

C.4916 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

- (a) Records of all required ~~monitoring~~ data, **reports** and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

- ~~(b) Records of required monitoring information shall include, where applicable:~~
~~(1) The date, place, and time of sampling or measurements;~~
~~(2) The dates analyses were performed;~~
~~(3) The company or entity performing the analyses;~~
~~(4) The analytic techniques or methods used;~~
~~(5) The results of such analyses; and~~
~~(6) The operating conditions existing at the time of sampling or measurement.~~

- ~~(c) Support information shall include, where applicable:~~
~~(1) Copies of all reports required by this permit;~~
~~(2) All original strip chart recordings for continuous monitoring instrumentation;~~
~~(3) All calibration and maintenance records;~~
~~(4) Records of preventive maintenance.~~

- ~~(d)~~**(b)** **Unless otherwise specified in this permit**, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

31. D.1.1 (Fuel Usage Limitations) "gas" was removed in order to clarify that T1 and T2 are fuel burning turbines not exclusive to natural gas.

D.1.1 Fuel Usage Limitations

The total combined fuel use in ~~gas~~ turbines T1 and T2 shall be limited as follows:

32. D.1.10 (now D.1.8) NSPS Compliance Provisions [40 CFR 60, Subpart GG] condition (a) has been moved to D.1.4 (NOx Emissions Limitations) and revised to incorporate the reference to CP-048-1841. The source requested the lower limits in their 1989 construction permit application in consideration of manufacturer provided information, flexibility in facility operations, and ease in monitoring compliance. In addition, the custom monitoring schedule procedures approved by EPA on April 05, 2001 state the required use of pipeline supplied natural gas to comply with the sulfur dioxide emissions standard.

~~D.1.10~~ **D.1.8** NSPS Compliance Provisions [40 CFR 60, Subpart GG]

- ~~(a)~~ ~~The turbine shall comply with the nitrogen oxides standard in Condition D.1.4 when burning natural gas or fuel oil; and nitrogen oxide emissions shall not exceed 42 ppm when combusting natural gas, and 65 ppm when combusting fuel oil at 15% oxygen by volume at a peak load not to exceed 14.4 gigajoules per watt hour.~~
- ~~(b)~~ **(a)** Pursuant to 40 CFR 60, Subpart GG and the custom monitoring schedule procedures approved by EPA on April 05, 2001, when combusting natural gas, the turbine shall comply with the sulfur dioxide emissions standard by using pipeline supplied natural gas.
- ~~(c)~~ **(b)** No alternate fuel burned in the gas turbine shall contain sulfur in excess of 0.8 percent by weight.

D.1.4 NOx Emissions Limitations

Pursuant to CP-048-1841, issued on May 11, 1990, the nitrogen oxide (NOX) emissions from the two (2) simple cycle gas turbines (T1 and T2) shall be limited to 42 parts per million dry volume (ppmdv) at 15 percent oxygen when combusting natural gas and 65 parts per million dry volume (ppmdv) at 15 percent oxygen when combusting fuel oil. [These limits are more stringent than the NSPS standards contained in 326 IAC 12 and 40 CFR 60.332 (a) (1) and (b)].

33. D.1.13 (now D.1.12) Visible Emissions Notations has been revised to specify the visible emissions notations are only required when combusting #2 fuel oil and not when burning natural gas.

~~D.1.13~~ **D.1.12** Visible Emissions Notations

(a) Visible emission notations of turbine T1 and T2 stack exhausts shall be performed once per shift during normal daylight operations **when combusting #2 fuel oil**. A trained employee shall record whether emissions are normal or abnormal.

34. D.2.1 (Fuel Usage Limitations) was changed in order to clarify the purpose and origin of the diesel fuel usage limits for D7 and D8. The Permittee voluntarily requested and accepts the fuel usage limits for D7 and D8. As a result, the following change has been made.

D.2.1 Fuel Usage Limitations

The Permittee requests and accepts diesel fuel usage limits for diesel engines D7 and D8. The total diesel fuel usage for diesel engines D7 and D8 shall be limited to 1,099 gallons per 365 day rolling total. This is equivalent to 0.24 tons per year of NOx emissions.

35. The following table in the TSD, page 3 of 8, showing the actual emissions from the source has been changed. The information reflecting the source's 1995 actual emission of NO_x has been corrected as follows:

Pollutant	Actual Emissions (tons/year)
PM	4.24
PM-10	4.23
SO ₂	1.46
VOC	5.75
CO	34.03
NO _x	34.33 3.00
HAP (specify)	No data submitted

36. The following Acid Rain Program Condition language changes have been added:

B.14 (now B.13) Permit Shield and B.19 (now B.18) Permit Amendment or Modification conditions were revised in order to reference the new Title IV Acid Rain section of the permit. Condition C.21 Emission Allowances was revised and moved to a new Section E of the permit and a new condition was added to Section E.

C SOURCE OPERATION CONDITIONS

Acid Rain Program

~~C.21 Emissions Allowances [326 IAC 2-7-5(4)]~~

Stratospheric Ozone Protection

~~C.22~~**18** Compliance with 40 CFR 82 and 326 IAC 22-1

E ACID RAIN PROGRAM CONDITIONS

E.1 Acid Rain Permit [326 IAC 2-7-5(1)(C)] [326 IAC 21]

E.2 Title IV Emissions Allowances [326 IAC 2-7-5(4)]

SECTION E

ACID RAIN PROGRAM CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

Two (2) 38.7 megawatt (net) simple cycle gas turbines using natural gas as the primary fuel with No. 2 fuel oil used as a backup identified as T1 and T2, and using a water injection system as control, with each turbine exhausting to stacks, identified as S/V 3 and S/V 4, respectively. When using natural gas, T1 and T2 each have a maximum heat input capacity of 431.3 MMBtu/hr. When using No. 2 fuel oil, T1 and T2 each have a maximum heat input capacity of 424.5 MMBtu/hr.

(The information describing the process contained in this facility description box is descriptive information

and does not constitute enforceable conditions.)

E.1 Acid Rain Permit [326 IAC 2-7-5(1)(C)] [326 IAC 21] [40 CFR 72 through 40 CFR 78]

- (a) **The Acid Rain Permit for this source, AR 095-11900-00051, issued on July 25, 2000 is incorporated by reference into this Part 70 permit. Pursuant to 326 IAC 21 (Acid Deposition Control), the Permittee shall comply with all provisions of the Acid Rain Permit issued for this source, and any other applicable requirements contained in 40 CFR 72 and 40 CFR 75 through 40 CFR 78.**
- (b) **Where an applicable requirement of the Clean Air Act is more stringent than an applicable requirement of regulations promulgated under Title IV of the Act, both provisions shall apply.**

~~C.24~~ **E.2 Title IV Emissions Allowances [326 IAC 2-7-5(4)] [326 IAC 21]**

Emissions exceeding any allowances that the Permittee lawfully holds under ~~the Title IV Acid Rain Program~~ of the Clean Air Act **are prohibited**, subject to the following limitations ~~are prohibited~~:

- (a) No revision of this permit shall be required for increases in emissions that are authorized by allowances acquired under ~~the Title IV acid rain program~~ **Acid Rain Program**, provided that such increases do not require a permit revision under any other applicable requirement.
- (b) No limit shall be placed on the number **of** allowances held by the Permittee. The Permittee may not use allowances as a defense to noncompliance with any other applicable requirement.
- (c) Any such allowance shall be accounted for according to the procedures established in regulations promulgated under Title IV of the Clean Air Act.

B.4413 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

- (b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. All previously issued operating permits are superseded by this permit, **except for permits issued pursuant to Title IV of the Clean Air Act (Acid Rain Program) and 326 IAC 21 (Acid Deposition Control).**

~~B.4918~~ **Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12] [40 CFR 72]**

- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) **Pursuant to 326 IAC 2-7-11(b) and 326 IAC 2-7-12(a), administrative Part 70 permit amendments and permit modifications for purposes of the acid rain portion of a Part 70 permit shall be governed by regulations promulgated under Title IV of the**

Clean Air Act.

- ~~(b)~~(c) Any application requesting a source modification or an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Anderson Office of Air Management
P.O. Box 2100
120 East 8th Street
Anderson, Indiana 46011

Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

- ~~(c)~~(d) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

Indiana Department of Environmental Management
Office of Air Quality
and the Anderson Office of Air Management

Technical Support Document (TSD) for a Part 70 Operating Permit

Source Background and Description

Source Name: Indiana Municipal Power Agency
Source Location: 6035 Park Road, Anderson, Indiana 46011
County: Madison
SIC Code: 4911
Operation Permit No.: T095-12389-00051
Permit Reviewer: Kimberly Titzer

The Office of Air Quality (OAQ) has reviewed a Part 70 permit application from the Indiana Municipal Power Agency relating to the operation of a gas turbine electrical generation facility.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

- (a) Two (2) 38.7 megawatt (net) simple cycle gas turbines using natural gas as the primary fuel with No. 2 fuel oil used as a backup identified as T1 and T2, and using a water injection system as control, with each turbine exhausting to stacks, identified as S/V 3 and S/V 4, respectively.
- (b) Two (2) 630 horsepower diesel engines used for turbine start-up, identified as D7 and D8, each exhausting at stacks, identified as S/V 5 and S/V 6, respectively.
- (c) Two (2) 300,000 gallon No. 2 fuel oil storage tanks, identified as FT10 and FT11.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

Insignificant Activities

This stationary source does not currently have any insignificant activities, as defined in 326 IAC 2-7-1 (21) that have applicable requirements.

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

- (a) FESOP095-5162-00051, issued on December 12, 1996
- (a) Acid Rain Permit 095-11900-00051, issued on July 25, 2000

All conditions from previous approvals were incorporated into this Part 70 permit, with the exception of updated language for each Section and conditions of the permit.

Although this source was previously limited to be a FESOP source, the IDEM, OAQ has determined the source to be subject to the provisions of the Acid Rain Program under Title IV of the Clean Air Act. Therefore, a Part 70 Operating Permit shall be issued to the source.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the Part 70 permit be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

The original FESOP permit application was used for the purposes of this review.

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA.

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	114.6
PM-10	114.6
SO ₂	568.7
VOC	47.2
CO	222.0
NO _x	1352.1

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAPs	Potential To Emit (tons/year)
Single HAPs	Less than 10
Combined HAPs	Less than 25

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of particulate matter less than ten (10) microns (PM10), sulfur dioxide (SO₂), carbon monoxide (CO) and nitrogen oxides (NO_x) are equal to or greater than 100 tons per year. Also, since the source is required to obtain an Acid Rain Permit, pursuant to Title IV of the Clean Air Act. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) Since this type of operation is not one of the twenty-eight (28) listed source categories

under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 1995 OAQ emission data.

Pollutant	Actual Emissions (tons/year)
PM	4.24
PM-10	4.23
SO ₂	1.46
VOC	5.75
CO	34.03
NO _x	34.33
HAP (specify)	No data submitted

Limited Potential To Emit

	Potential to Emit (tons/year)						
Process/facility	PM	PM-10	SO ₂	VOC	CO	NO _x	HAPs
Total source	<100	<100	<100	N/A	<100	<100	N/A

County Attainment Status

The source is located in Madison County.

Pollutant	Status
PM-10	Attainment
SO ₂	Attainment
NO ₂	Attainment
Ozone	Attainment
CO	Attainment
Lead	Attainment

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO_x) are precursors for the formation of ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. Madison County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (b) Madison County has been classified as attainment or unclassifiable for all criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

- (a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.
- (b) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

Federal Rule Applicability

- (a) The gas turbines are subject to the New Source Performance Standard, 326 IAC 12, (40 CFR 60, Subpart GG (Standards of Performance for Stationary Gas Turbines)). Therefore, the Permittee shall comply with the provisions of 40 CFR 60, Subpart GG, as follows:

- (1) limit nitrogen oxides emissions, as required by 40 CFR 60.332, to:

$$\text{STD} = 0.0075 \frac{(14.4)}{Y} + F,$$

where STD = allowable NO_x emissions (percent by volume at 15 percent oxygen on a dry basis).

Y = manufacturers rated heat rate at manufacturers rated load (kilojoules per watt hour) or, actual measured heat rate based on lower heating value of fuel as measured at actual peak load for the facility. The value of Y shall not exceed 14.4 kilojoules per watt hour.

F = NO_x emission allowance for fuel-bound nitrogen as defined in paragraph (a)(3) of 40 CFR 60.332.

- (2) limit sulfur dioxide emissions, as required by 40 CFR 60.333, to 0.015 percent by volume at 15 percent oxygen on a dry basis, or use natural gas fuel with a sulfur content less than or equal to 0.8 percent by weight;
 - (3) install a continuous monitoring system to monitor and record the fuel consumption and the ratio of water to fuel being fired in the turbine, as required by 40 CFR 60.334(a);
 - (4) determine compliance with the nitrogen oxides and sulfur dioxides standards in 40 CFR 60.332 and 60.333(a), per the requirements described in 40 CFR 60.335(c);
 - (5) determine the sulfur content of the natural gas/ fuel oil being fired in the gas turbines by the ASTM methods D 1072-80, D 3031-81, D 4084-82, or D 3246-81. The applicable ranges of some ASTM methods mentioned are not adequate to measure the levels of sulfur in some fuel gases. Dilution of samples before analysis (with verification of the dilution ratio) may be used, subject to the Approval of the Administrator; and
 - (6) determine the nitrogen content of the natural gas/ fuel oil being fired in the gas turbines by using analytical methods and procedures that are accurate to within 5 percent and are approved by the Administrator.
 - (7) report periods of excess emissions, as required by 40 CFR 334(c).

- (b) The No. 2 fuel oil storage tanks are subject to the New Source Performance Standard, 326 IAC 12, (40 CFR 60, Subpart Kb (Standards of Performance for Volatile Organic Liquid Storage Vessels)). Therefore, the No. 2 fuel oil storage tanks are subject to the recordkeeping provisions of 40 CFR 60, Subpart Kb.
- (c) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this source.
- (d) This source is not subject to the Compliance Assurance Monitoring (CAM) requirements, (40 CFR 64), based on applicability exemption 40 CFR 64.2(b)(v), because this source operates existing continuous emissions monitors. Also, based on applicability exemption 40 CFR 64.2(b)(iii), the source is not subject to the CAM requirements based on Acid Rain Program Requirements.

State Rule Applicability - Entire Source

326 IAC 1-6-3 (Preventive Maintenance Plan)

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than one hundred (100) tons per year of particulate matter less than ten (10) microns (PM10), sulfur dioxide (SO₂), carbon monoxide (CO) and nitrogen oxides (NO_x). Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by July 1 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity from all units except the gas turbines, shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability - Gas Turbines

Fuel Usage Limitations

The total combined fuel use in gas turbines T1 and T2 shall be limited as follows:

- (a) Fuel limit when natural gas is the only fuel during the 365 day period:
675.0 million standard cubic feet (MMSCF) per 365 day rolling total
- (b) Fuel limit when No. 2 fuel oil is the only fuel during the 365 day period:
3.36 million gallons per 365 day rolling total

326 IAC 2-2 (PSD Minor Limit)

The nitrogen oxides emissions from gas turbines T1 and T2 shall not exceed 42 ppm_{dv} at 15% oxygen for natural gas combustion and 65 ppm_{dv} at 15% oxygen for No. 2 oil combustion. These limits restrict potential NO_x emissions to less than the 250 ton per year Prevention of Significant Deterioration (PSD) major source level, therefore the State and Federal Rules for PSD do not apply.

326 IAC 12-1 (General Provisions Relating to NSPS)

The provisions of 40 CFR 60, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 12-1, apply to the facility described in this section except when otherwise specified in 40 CFR 60, Subpart GG (Standards of Performance for Stationary Gas Turbines).

Sulfur Dioxide

Pursuant to Construction Permit 048-1841, issued on May 11, 1990, the sulfur content of any fuel used in the turbines (natural gas or oil) shall be limited to 0.3% by weight. This shall satisfy the requirements of 40 CFR 60.333.

326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations)

Pursuant to 326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations), the sulfur dioxide emissions from the 424.5 million (MM) Btu per hour turbines shall be limited to 0.5 pounds per million (MM) Btu heat input when combusting fuel oil.

326 IAC 5-1 (Opacity)

Pursuant to Construction Permit 048-1841, issued on May 11, 1990, opacity from the combustion turbine stacks, S/V 3 and S/V 4, shall be limited to twenty percent (20%) opacity.

State Rule Applicability - Diesel engines

Fuel Usage Limitations

The total diesel fuel usage for diesel engines D7 and D8 shall be limited to 1,099 gallons per 365 day rolling total.

State Rule Applicability - No. 2 fuel oil tanks

326 IAC 12-1 (General Provisions Relating to NSPS)

The provisions of 40 CFR 60, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 12-1, apply to the facility described in this section except when otherwise specified in 40 CFR 60, Subpart Kb (Standards of Performance for Volatile Organic Liquid Storage Vessels).

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D

of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

- (A) The gas turbines have applicable compliance monitoring conditions as specified below:
 - (1) Continuous Emissions Monitoring [326 IAC 3-5][326 IAC 12][40CFR 60, Subpart GG]
Pursuant to 326 IAC 3-5 (Continuous Monitoring of Emissions) and 40 CFR 60, Subpart GG, a continuous monitoring system shall be calibrated, maintained, and operated to monitor and record the fuel consumption and the ratio of water to fuel being fired in the turbine, as required by 40 CFR 60.334(a).
 - (2) Sulfur Content and Nitrogen Content [326 IAC 12] [40 CFR 60, Subpart GG]
Pursuant to 40 CFR 60, Subpart GG, the Permittee shall monitor the nitrogen and sulfur content of the fuel being fired in the turbine. The frequency of determination of these values shall be as follows:
 - (a) If the turbine is supplied its fuel from a bulk storage tank, the values shall be determined on each occasion that fuel is transferred to the storage tank from any other source.
 - (b) If the turbine is supplied its fuel without intermediate bulk storage the values shall be determined and recorded daily. Owners, operators or fuel vendors may develop custom schedules for determination of the values based on the design and operation of the affected facility and the characteristics of the fuel supply. These custom schedules shall be substantiated with data and must be approved by the Administrator before they can be used to comply with the monitoring requirements.

The sulfur and nitrogen content information obtained from this monitoring shall be used to document compliance with the limits stated in Conditions D.1.2, D.1.4, D.1.5 and D.1.6.

- (3) Visible Emissions Notations
 - (a) Visible emission notations of turbines T1 and T2 stack exhausts shall be performed once per shift during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
 - (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
 - (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
 - (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 188 hazardous air pollutants (HAPs) set out in the 1990 Clean Air Act. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Quality (OAQ) Part 70 Application Form GSD-08.

- (a) This source will emit levels of air toxics less than those which constitute a major source according to Section 112 of the 1990 Clean Air Act.

Conclusion

The operation of this gas turbine electric generating plant shall be subject to the conditions of the attached proposed Part 70 Permit No. T095-12389-00051.

SIMPLE CYCLE TURBINE GENERATORS

Source Name: Indiana Municipal Power Agency
Source Location: 6030 Park Road, Anderson, Indiana 46011
Permit #: T095-12389-00051
Plant ID: 095-00051
Permit Reviewer: Patrick Burton

I. Facility Description

A. Two (2) simple cycle gas turbine generators using natural gas as the primary fuel and No. 2 fuel oil as a back-up fuel (units T1 & T2)

Base load capacity of each: 38,670 kW with a total heat input of 431.2 MMBtu/hr on natural gas and

Base load capacity of each: 37,730 kW with a total heat input of 424.5 MMBtu/hr on No. 2 fuel oil.

Emission controls: Water injection

Stack ID's: Unit 1 is S/V 3, Unit 2 is S/V 4

II. Potential Emissions

Total heat input (MMBtu/hr) for Natural gas = 431.2

S % sulfur content of fuel oil =

Total heat input (MMBtu/hr) for No. 2 fuel oil = 424.5

S % sulfur content of natural gas =

Pollutant	Natural Gas					Distillate (No. 2) Fuel Oil				
	Ef-bc	Ef-ac	Potential Emissions			Ef-bc	Ef-ac	Potential Emissions		
	(lb/MMBtu)	(lb/MMBtu)	lbs/hr	tons/yr	tons/yr	(lb/MMBtu)	(lb/MMBtu)	lbs/hr	tons/yr	tons/yr
			Ebc	Ebc	Eac			Ebc	Ebc	Eac
PM	0.0066	ND	2.8	12.5	12.5	0.012	0.012	5.1	22.3	22.3
PM-10	0.0066	ND	2.8	12.5	12.5	0.012	0.012	5.1	22.3	22.3
SO ₂	0.003	ND	1.2	5.3	5.3	0.003	ND	1.2	5.2	5.2
NO _x	0.32	0.13	138.0	604.4	245.5	0.880	0.240	373.6	1636.2	446.2
VOC	0.002	ND	0.9	4.0	4.0	0.0004	0.0004	0.2	0.8	0.7
CO	0.08	0.03	35.4	154.9	56.7	0.003	0.076	1.4	6.1	141.3
Nickel	ND	ND	0.0	0.0	0.0	1.20E-03	ND	0.51	2.23	2.23
Manganese	ND	ND	0.0	0.0	0.0	3.40E-04	ND	0.14	0.63	0.63
Phosphorus	ND	ND	0.0	0.0	0.0	3.00E-04	ND	0.13	0.56	0.56
Lead	ND	ND	0.0	0.0	0.0	5.80E-05	ND	0.02	0.11	0.11
Chromium	ND	ND	0.0	0.0	0.0	4.70E-05	ND	0.02	0.09	0.09
Antimony	ND	ND	0.0	0.0	0.0	2.20E-05	ND	0.01	0.04	0.04
Arsenic	ND	ND	0.0	0.0	0.0	4.90E-06	ND	0.00	0.01	0.01

Methodology

1) Natural gas:

1 cubic foot of natural gas has a heating value of 1,000 Btu

Emission Factors are from AP 42 (4/00 version), Chapter 3.1, Tables 3.1-2, SCC #2-01-002-01

NO_x after control emission factors are from stack test data, SO₂ (lb/MMBtu) = 0.94 * Sulfur content(%)

Emissions (ton/yr) = Heat Input Capacity (MMBtu/hr) x Emission factor (lb/MMBtu) x 8,760 hrs/yr / 2000 lbs/ton

2) No.2 distillate fuel oil:

1 gallon of No. 2 Fuel Oil has a heating value of 138,123 Btu

Emission Factors are from AP 42 (4/00 version), Chapter 3.1, Tables 3.1-2, SCC #2-01-002-01

NO_x after control emission factors are from stack test data, SO₂ (lb/MMBtu) = 1.01 * Sulfur content(%)

Emissions (ton/yr) = Heat Input Capacity (MMBtu/hr) x Emission factor (lb/MMBtu) x 8,760 hrs/yr / 2000 lbs/ton

III. Limited Emissions - Natural gas & NO. 2 fuel oil

Since the source-wide potential to emit (PTE) SO₂, NO_x, and CO is greater than 100 tons per year, the company has agreed to limit the total fuel usage to the turbines to 675,000,000 cubic feet of natural gas per year and a maximum of 3,360,000 gallons of fuel oil per year.

Limited natural gas usage (MMCF/yr) = 675.00

S % sulfur content of fuel oil =

Limited fuel oil usage (MMgal/yr) = 3.360

S % sulfur content of natural gas =

Pollutant	Natural Gas					Distillate (No. 2) Fuel Oil				
	Ef-bc	Ef-ac	Limited Emissions			Ef-bc	Ef-ac	Limited Emissions		
	(lb/MMBtu)	(lb/MMBtu)	lbs/hr	tons/yr	tons/yr	(lb/MMBtu)	(lb/MMBtu)	lbs/hr	tons/yr	tons/yr
			Ebc	Ebc	Eac			Ebc	Ebc	Eac
PM	0.0066	ND	0.5	2.2	2.2	0.012	0.012	0.64	2.78	2.78
PM-10	0.0066	ND	0.5	2.2	2.2	0.012	0.012	0.64	2.78	2.78
SO ₂	0.003	ND	0.2	1.0	1.0	0.003	ND	0.15	0.65	0.65

NOx	0.32	0.13	24.7	108.0	43.9	0.880	0.240	46.62	204.20	55.69
VOC	0.002	ND	0.2	0.7	0.7	0.0004	0.0004	0.02	0.10	0.09
CO	0.08	0.03	6.3	27.7	10.1	0.003	0.076	0.17	0.77	17.64
Total HAPs	ND	ND	0.0	0.0	0.0	1.20E-03	ND	0.00	0.00	0.00

Methodology

1) Natural gas:

1 cubic foot of natural gas has a heating value of 1,000 Btu

Emission Factors are from AP 42 (4/00 version), Chapter 3.1, Tables 3.1-2, SCC #2-01-002-01

NOx after control emission factors are from stack test data, SO2 (lb/MMBtu) = 0.94 * Sulfur content(%)

Limited Emissions (ton/yr) = Natural Gas Usage (MMCF/yr) x Heating Value (1000 Btu/CF) x Emission factor (lb/MMBtu) / 2000 lbs/ton

ND = No data available, therefore

2) No.2 distillate fuel oil:

1 gallon of No. 2 Fuel Oil has a heating value of 138,123 Btu

Emission Factors are from AP 42 (4/00 version), Chapter 3.1, Tables 3.1-2, SCC #2-01-002-01

NOx after control emission factors are from stack test data, SO2 (lb/MMBtu) = 1.01 * Sulfur content(%)

Limited Emissions (ton/yr) = Fuel Oil Usage (MMgal/yr) x Heating Value (138,123 Btu/gal) x Emission factor (lb/MMBtu) / 2000 lbs/ton

ND = No data available

Page 2 of 2

Source Name: Indiana Municipal Power Agency

Permit #: T177-12388-00040

Permit Reviewer: Patrick Burton

IV. Limited Emissions - Natural gas only

Since the source-wide potential to emit (PTE) SO2, NOx, and CO is greater than 100 tons per year, the total fuel usage to the turbines shall be limited to 706.5 million cubic feet of natural gas per year.

Limited natural gas usage (MMCF/yr) =

706.5

S % sulfur content of fuel oil =

Limited fuel oil usage (MMgal/yr) =

0.000

S % sulfur content of natural gas =

Pollutant	Natural Gas					Distillate (No. 2) Fuel Oil				
	Ef-bc	Ef-ac	Limited Emissions			Ef-bc	Ef-ac	Limited Emissions		
	(lb/MMBtu)	(lb/MMBtu)	lbs/hr	tons/yr	tons/yr	(lb/MMBtu)	(lb/MMBtu)	lbs/hr	tons/yr	tons/yr
			Ebc	Ebc	Eac			Ebc	Ebc	Eac
PM	0.0066	ND	0.5	2.3	2.3	0.012	0.012	0.00	0.00	0.00
PM-10	0.0066	ND	0.5	2.3	2.3	0.012	0.012	0.00	0.00	0.00
SO2	0.003	ND	0.2	1.0	1.0	0.003	ND	0.00	0.00	0.00
NOx	0.32	0.13	25.8	113.0	45.9	0.880	0.240	0.00	0.00	0.00
VOC	0.002	ND	0.2	0.7	0.7	0.0004	0.0004	0.00	0.00	0.00
CO	0.08	0.03	6.6	29.0	10.6	0.003	0.076	0.00	0.00	0.00
Total HAPs	ND	ND	0.0	0.0	0.0	1.20E-03	ND	0.00	0.00	0.00

ND = No data available

V. Limited Emissions - No. 2 fuel oil only

Since the source-wide potential to emit (PTE) SO2, NOx, and CO is greater than 100 tons per year, the total fuel usage to the turbines shall be limited to 4.72 million gallons of No. 2 fuel oil per year.

Limited natural gas usage (MMCF/yr) =

0.00

S % sulfur content of fuel oil =

Limited fuel oil usage (MMgal/yr) =

4.720

S % sulfur content of natural gas =

Pollutant	Natural Gas					Distillate (No. 2) Fuel Oil				
	Ef-bc	Ef-ac	Limited Emissions			Ef-bc	Ef-ac	Limited Emissions		
	(lb/MMBtu)	(lb/MMBtu)	lbs/hr	tons/yr	tons/yr	(lb/MMBtu)	(lb/MMBtu)	lbs/hr	tons/yr	tons/yr
			Ebc	Ebc	Eac			Ebc	Ebc	Eac
PM	0.0066	ND	0.0	0.0	0.0	0.012	0.012	0.89	3.91	3.91
PM-10	0.0066	ND	0.0	0.0	0.0	0.012	0.012	0.89	3.91	3.91
SO2	0.003	ND	0.0	0.0	0.0	0.003	ND	0.21	0.92	0.92
NOx	0.32	0.13	0.0	0.0	0.0	0.880	0.240	65.49	286.85	78.23
VOC	0.002	ND	0.0	0.0	0.0	0.0004	0.0004	0.03	0.13	0.13

CO	0.08	0.03	0.0	0.0	0.0	0.003	0.076	0.25	1.08	24.77
Total HAPs	ND	ND	0.0	0.0	0.0	1.20E-03	ND	0.09	0.39	0.39

ND = No data available

0.30
0.8 ppm

Worst Case		
Potential Emissions		
lbs/hr	tons/yr	tons/yr
Ebc	Ebc	Eac
5.1	22.3	22.31
5.1	22.3	22.31
1.2	5.3	5.33
373.6	1636.2	446.23
0.9	4.0	3.97
35.4	154.9	141.31
0.51	2.23	2.23
0.14	0.63	0.63
0.13	0.56	0.56
0.02	0.11	0.11
0.02	0.09	0.09
0.01	0.04	0.04
0.00	0.01	0.01

er year.

0.30
0.8 ppm

TOTAL		
Limited Emissions		
lbs/hr	tons/yr	tons/yr
Ebc	Ebc	Eac
1.14	5.01	5.01
1.14	5.01	5.01
0.37	1.61	1.61

71.28	312.20	99.57
0.18	0.80	0.80
6.49	28.44	27.76
0.00	0.00	0.00

0.30
0.8 ppm

TOTAL		
Limited Emissions		
lbs/hr	tons/yr	tons/yr
Ebc	Ebc	Eac
0.53	2.33	2.33
0.53	2.33	2.33
0.23	1.00	1.00
25.81	113.04	45.92
0.17	0.74	0.74
6.61	28.97	10.60
0.00	0.00	0.00

0.30
0.8 ppm

TOTAL		
Limited Emissions		
lbs/hr	tons/yr	tons/yr
Ebc	Ebc	Eac
0.89	3.91	3.91
0.89	3.91	3.91
0.21	0.92	0.92
65.49	286.85	78.23
0.03	0.13	0.13

0.25	1.08	24.77
0.09	0.39	0.39

Appendix A: Emission Calculations
Internal Combustion Engines - Diesel Fuel
Turbine (>600 HP)

Source Name: Indiana Municipal Power Agency
Source Location: 6030 Park Road, Anderson, Indiana 46011
Permit #: T095-12389-00051
Plant ID: 095-00051
Permit Reviewer: Patrick Burton

I. Facility Description

Two (2) 2.0 MMBtu/hr diesel engine (units D7 & D8);
Emission controls: none
Stack ID's: unit D7 is S/V 5, unit D8 is S/V 6

A. Emissions calculated based on limited fuel usage (gals/yr).

Heat Value Diesel* Fuel Usage Limit S= 0.3 = WEIGHT % SULFUR
(MMBtu/gal) (Gal)

0.138123 1099

Emission Factor in lb/MMBtu	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	0.1	0.0573	0.3	3.2	0.1	0.85
				**see below		
Potential Emission in tons/yr	0.0076	0.0	0.0230	0.2429	0.0068	0.0645

*AP42 Heat Value for Diesel= 137,000 Btu/gal, Source Requested 138,123 Btu/gal Heat Value for Diesel

**NOx emissions: uncontrolled = 3.2 lb/MMBtu, controlled with ignition timing retard = 1.9 lb/MMBtu

Methodology:

Limited emissions calculations (diesel fuel):

1 gallon of diesel fuel has a heating value of 138,123 Btu

Emission Factors are from AP 42 (Supplement B 10/96)Table 3.4-1 and Table 3.4-2, Appendix A

Emission (tons/yr) = Heating value (MMBtu/gal) x Limited throughput (gal/yr) x AP42 Emission Factor (lb/MMBtu)/ (2,000 lb/ton